



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

5636 Southern Boulevard, Virginia Beach, Virginia 23462

(757) 518-2000 Fax (757) 518-2103

www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Francis L. Daniel
Regional Director

July 9, 2009

Mr. Robert W. May, PG
Vice President/Mid-Atlantic Region Manager
IMS Environmental Services, Inc.
P.O. Box 1779.
Norfolk, VA 23501-1779

WARNING LETTER

**Re: Regulated Medical Waste, IMS Environmental Services, Inc., 1301 Marsh Street, Norfolk, VA 23523
RMW registered transporter # IWT0000010177**

Dear Mr. May:

The Department of Environmental Quality ("Department" or "DEQ") has reason to believe that the IMS Environmental Services, Inc. ("IMS") facility, located at 1301 Marsh St., Norfolk, VA 23523 may be in violation of the Waste Management Law and Regulations.

This letter addresses conditions at the facility named above, and also cites compliance requirements of the Waste Management Law and Regulations. Pursuant to Va. Code § 10.1-1455 (G), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 *et seq.* The Department requests that you respond **within 10 days of the date of this letter.**

OBSERVATIONS AND LEGAL REQUIREMENTS

DEQ staff accompanied USEPA Region 3 staff on a RCRA Subtitle C compliance inspection of the IMS facility ("Facility") located at 1301 Marsh St., Norfolk, VA 23523 on May 12, 2009. A re-inspection of the facility by DEQ staff was conducted on June 26, 2009. The following describe the staff's factual observations and identify the applicable legal requirements:

1. *Observations:* During the May 12, 2009 inspection, DEQ staff observed three (3) red bags and three (3) boxes, which were labeled with the biological hazardous symbol and/or other words identifying the contents as "Regulated Medical Waste" ("RMW"), in a "connex" box at the Facility. Based on the observed labeling/markings on the bags and boxes it appears the material being accumulated in the connex box is RMW.

Legal Requirements: 9 VAC 20-120-90.1 Packaging. Treated waste that was once regulated, but is no longer regulated medical waste, shall not be packaged as regulated medical waste. Solid waste packaged as regulated medical waste is regulated medical waste.

2. *Observations:* RMW at the IMS facility is not packaged and labeled in accord with Part IV (9 VAC 20-120-210 and 9 VAC 20-120-220.) of this chapter. During the May 12, 2009 inspection several bags were observed without labels and the majority of the RMW packages did not have dates on them.

Legal Requirements: 9 VAC 20-120-450. Packaging and labeling. No person shall transport or receive for transport any regulated medical waste that is not packaged and labeled in accord with Part IV (9 VAC 20-120-160 et seq.) of this chapter.

3. *Observations:* On June 26, 2009, IMS indicated to DEQ staff that the RMW observed on May 12, 2009 was generated at off-site facilities for which IMS serves as a clean up contractor, was transported by IMS to the facility, accumulated in the connex box and was awaiting pick-up by Stericycle. On July 6, 2009 IMS provided to DEQ information indicating that one bag of RMW was generated on April 24, 2009, three boxes of RMW were generated on April 25, 2009 and two bags of RMW were generated on April 30, 2009 at three different off-site facilities as part of IMS response actions at the facilities. All six packages of RMW were removed from IMS by a registered transporter and shipped to an appropriate treatment facility on June 4, 2009. IMS is a registered RMW transporter (RMW Transporter Registration # IWT0000010177) but DEQ has not issued IMS a permit to treat, store, or dispose of RMW.

Legal Requirements: 9 VAC 20-120-70.A. Relationship to other bodies of regulation. The Solid Waste Management Regulations (9 VAC 20-80) address other requirements for regulated medical waste management. Any regulated medical waste management facility must also conform to any applicable sections of the solid waste management regulations issued by the board and any special solid waste management regulations such as those defining financial assurance requirements. If there is a conflict between the details of regulations here and the others, this chapter is defining.

Legal Requirements: 9 VAC 20-80-10 Definitions. "Transfer Station" means any solid waste storage or collection facility at which solid waste is transferred from collection vehicles to haulage vehicles for transportation to a central solid waste management facility for disposal, incineration or resource recovery.

Legal Requirements: 9 VAC 20-80-340.A.2. Storage of nonhazardous solid wastes and hazardous wastes, or hazardous wastes from conditionally exempt small quantity generators as defined in the Virginia Hazardous Waste Management Regulations (9VAC 20-60) at a transportation terminal or transfer station in closed containers meeting the U. S. Department of Transportation specifications is exempt from this section and Part VII (9VAC 20-80-480 et seq.) of this chapter provided such wastes are removed to a permitted storage or disposal facility within ten days from the initial receipt from the waste generator. To be eligible for this exemption, each shipment must be properly documented to show the name of the generator, the date of receipt by the transporter and the date and location of the final destination of the shipment. The documentation shall be kept at the terminal for at least three years after the shipment has been completed and shall be made available to the department upon request. All such activities shall comply with local ordinances.

Legal Requirements: 9 VAC 20-120-160. Permit required. No person who is subject to this chapter shall treat, store, or dispose of regulated medical waste without a permit from the department to engage in those activities.

4. **Observations:** DEQ does not have documentation of financial assurance for the operation of a regulated medical waste management facility located at 1301 Marsh St., Norfolk, VA 23523

Legal Requirements: 9 VAC 20-120-190. Financial assurance requirements. The department has adopted and will maintain a separate regulation, the Financial Assurance Regulations for Solid Waste Facilities, which shall be applicable in all parts to regulated medical waste management facilities. Nothing in this chapter governing regulated medical waste management shall be considered to delete or alter any requirements of the department as set out in Financial Assurance Regulations for Solid Waste Facilities.

5. **Observations:** The container where the RMW was stored is not refrigerated. During the May 12, 2009 inspection, a label on one bag of RMW indicated the date of generation as April 30, 2009. Information received on July 6, 2009 from IMS indicates the RMW was not transported to a disposal facility until June 4, 2009. In addition, the majority of the RMW packages within the connex box were noted to be missing the date of generation.

Legal Requirements: 9 VAC 20-120-430 Temperature control and storage period. Any regulated medical waste stored for more than seven days must be refrigerated, stored in an ambient temperature between 35° and 45°F (2° and 7°C). Any vehicle parked 24 hours or more during transport will be considered a storage facility subject to the requirements of Part V (9 VAC 20-120-330 et seq) of this chapter. No storage during transport will be allowed without a permit issued in accordance with the procedures in Part X (9 VAC 20-120 et seq) of this chapter.

ENFORCEMENT AUTHORITY

Va. Code § 10.1-1455 of the Waste Management Act provides for an injunction for any violation of the Waste Management Act, Waste Management Board regulations, an order, or permit condition, and provides for a civil penalty up to \$32,500 per day of each violation of the Waste Management Act, regulation, order, or permit condition. In addition, Va. Code § 10.1-1455 (G) authorizes the Waste Management Board to issue orders to any person to comply with the Waste Management Act and regulations, including the imposition of a civil penalty for violations of up to \$100,000. Also, Va. Code § 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the Waste Management Act and regulations, and to impose a civil penalty of not more than \$10,000. Va. Code §§ 10.1-1455 (D) and 10.1-1455 (I) provide for other additional penalties.

The Court has the inherent authority to enforce its injunction, and is authorized to award the Commonwealth its attorneys' fees and costs.

FUTURE ACTIONS

After reviewing this letter, please respond in writing to DEQ **within 20 days of the date of this letter** detailing actions you have taken or will be taking to ensure compliance with state law and regulations. If corrective action will take longer than 90 days to complete, you may be asked to sign a Letter of Agreement or enter into a Consent Order with the department to formalize the plan and schedule. *It is DEQ policy that appropriate, timely, corrective action undertaken in response to a Warning Letter will avoid adversarial enforcement proceedings and the assessment of civil charges or penalties.*

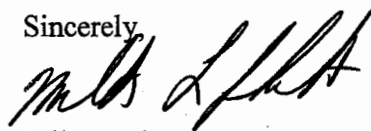
Please advise us if you dispute any of the observations recited herein or if there is other information of which DEQ should be aware. In the event that discussions with staff do not lead to a satisfactory conclusion concerning the contents of this letter, you may elect to participate in DEQ's Process for Early Dispute Resolution. If you complete the Process for Early Dispute Resolution and are not satisfied with the resolution, you may request in writing that DEQ take all necessary steps to issue a case decision where appropriate. For further information on the Process for Early Dispute Resolution, please

IMS Environmental, Inc.
July 9, 2009
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visit the Department's website under "Laws & Regulations" and "DEQ regulations" at:
http://www.deq.virginia.gov/regulations/pdf/Process_for_Early_Dispute_Resolution_8260532.pdf
or ask the DEQ contact listed below.

I am your contact at DEQ for this matter. Please direct written materials to my attention. If you have question or wish to arrange a meeting, you may contact me at 757-518-2151 or milton.johnston@deq.virginia.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Milton Johnston", written over a horizontal line.

Milton Johnston
Waste Program Manager

cc: Martin Matlin, EPA Region 3 (electronic)
File NHW



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June 5, 2009

Mr. Robert W. May, PG
Mid-Atlantic Region Manager
IMS Environmental Services, Inc.
PO Box 1779
Norfolk, Virginia 23501-1779

RE: EPA ID #VAD041447111
IMS Environmental Services, Inc.,
1301 Marsh Street
Norfolk

Dear Mr. May:

On May 12, 2009, Virginia Department of Environmental Quality ("DEQ" or "the Department") Tidewater Regional Office staff accompanied US Environmental Protection Agency ("EPA") staff during an EPA-lead compliance evaluation inspection of the referenced facility, IMS Environmental Services, Incorporated ("IMS"). DEQ staff used the EPA site visit as an opportunity to perform a focused compliance inspection and review waste transfer facility operations and discuss the observation noted below. It was noted that IMS maintains a current hazardous waste transporters' permit in Virginia and is also listed as a used oil transporter. During this review it was also noted that the facility did not appear to be in full compliance with the Virginia Hazardous Waste Management Regulations ("VHWMR"), as discussed below. No further response from IMS is requested however. The following describes the staff's factual observations and identifies the applicable legal requirements:

Observation: A review conducted on April 7, 2009, by DEQ staff of IMS' *Transporter Annual Report*, dated March 31, 2009, for reporting year 2008, and prior to the site visit, included the following manifested shipment of hazardous waste that indicated apparent storage for greater than ten days at the IMS Norfolk, Virginia facility. Manifest Number 000172486JJK for one 30-gallon container of lead-acid batteries indicated the container was initially transported on September 17, 2008. The container was received at the IMS Norfolk transfer facility that same day according to the IMS Hazardous Materials/Waste Log. Also according to the log, the container was shipped from the transfer facility on September 28, 2008, or eleven (11) days later. The container was in transit until it was accepted at the designated facility on October 9, 2008, according to the signed return manifest. This last date was reported in the annual report, as appropriate.

Legal Requirements:¹

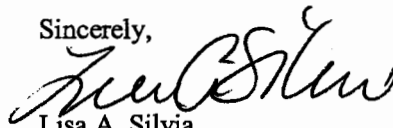
1) 40 CFR 263.12, as adopted by reference in the VHWMR, states that a transporter who stores manifested shipments of hazardous waste in containers meeting the requirements of 40 CFR 262.30 at a transfer facility for a period of 10 days or less is not subject to regulation under parts 270, 264, 265, and 268 of this chapter with respect to the storage of those wastes.

2) 9 VAC 20-60-500 of the VHWMR states that a transporter who stores manifested shipments of hazardous waste in containers meeting the requirements of 40 CFR 262.30 at a transfer facility for a period of 10 days or less is not subject to regulations established for facility management and permitting under these regulations with respect to storage of those wastes.

It is noted that IMS disclosed the greater than ten day storage in a cover letter to the DEQ Tidewater Regional Office accompanying the 2008 annual report, in addition to seven additional apparent greater than ten day storage incidents. The additional incidents were subsequently dismissed as additional documentation supported that the shipments were on site for less than ten days and were in transit for the remaining apparent additional days. IMS also offered additional information prior to and during the May 12, 2009 site visit to detail the cause of the additional storage time due to waste profile delays with the generator and the designated facility. DEQ accepts the explanation provided and no additional corrective action or response is requested. DEQ requests that IMS staff contact the DEQ regional waste compliance staff in a timelier manner for any future events that appear to affect the ability to meet the ten-day storage limitation and prior to submittal of the annual transporters' report.

Please feel free to contact me at (757) 518-2175 or Lisa.Silvia@deq.virginia.gov if you have any questions about the content of this letter or need additional guidance in achieving or maintaining compliance.

Sincerely,



Lisa A. Silvia

Waste Inspector Senior II

cc: Julia King-Collins, DEQ, OWTS (*electronic*)
Milton Johnston, DEQ – TRO (*electronic*)
Robin Schuhmann, DEQ-TRO (*electronic*)
Martin Matlin, USEPA Region 3 (*electronic*)
File - NHW
Kimberlyn Hughes, DEQ, OWTS (*electronic database form only*)

¹ The Virginia Hazardous Waste Management Regulations ("VHWMR") are set forth at 9 VAC 20-60-12 *et seq.* (the "Regulations"). The Regulations at 9 VAC 20-60-124, 260-266, -268, -270, -273 and -279 adopt by reference certain provisions of Title 40 of the Code of Federal Regulations ("CFR"). Citations made herein will be to the relevant section of the CFR which are incorporated by reference into the Regulations.



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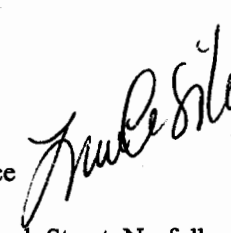
MEMORANDUM

DATE: June 5, 2009

TO: Julia King-Collins, DEQ, OWTS
Milton Johnston, DEQ - TRO
Robin Schuhmann, DEQ-TRO
Martin Matlin, USEPA Region 3 (*electronic*)
File - NHW

FROM: Lisa A. Silvia, Waste Inspector Senior II, Tidewater Regional Office

RE: EPA ID #VAD041447111, IMS Environmental Services, 1301 Marsh Street, Norfolk
USEPA Region 3 RCRA Subtitle C Compliance Evaluation Inspection/VDEQ Focused
Compliance Inspection



On May 12, 2009, DEQ Tidewater Regional Office staff accompanied the USEPA Region 3 inspectors, Martin Matlin and Jan Szaro, during a USEPA-lead RCRA Subtitle C compliance evaluation inspection at the referenced facility. The site visit served as a focused compliance inspection for VDEQ.

The following is a highlight of observations made during the site visit. Possible areas of concern and/or items that may require additional information are presented in bold. The full detailed observations are found in the inspector's field notes, dated May 12, 2009, and found in the DEQ regional office hazardous waste facility file.

- 1) The inspection began with a detailed discussion of IMS Environmental Services' ("IMS") operations at the Marsh Street facility, including management of recovered petroleum, oil, and lubricants ("POL"), as well as waste transport services.
- 2) According to site representatives, POL is recovered and managed through phase separation in a below-grade oil/water separator and/or single-walled, above ground storage tanks. Tanks are also used for storage of separated POL, and virgin diesel fuel for use on site. All underground storage tanks on the property were removed in the 1990s. Adjacent to the tank farm on a paved area was seven tank trailers and four FRAC tanks for use.
- 3) **One 55-gallon container was observed in the area of the FRAC tanks that appeared to be full but had no markings.** An employee of IMS stated the container was of gasoline-contaminated water from a gasoline service station that was being transferred into one of the gasoline separation tank trailers on site for recovery.

- 4) A dispenser for diesel fuel for IMS' trucks had underground suction lines that connected to an above ground tank of virgin diesel in the tank farm.
- 5) A mobile air stripper was observed next to a tank trailer and identified as used to strip gasoline from water.
- 6) Oil is marketed through a broker, FCC Environmental, Rockville, Virginia. **Gasoline is sent to the Gladio Refinery in Indiana. [Author's note – "Gladio" Refinery, Indiana could not be verified in an internet search.]**
- 7) Separated waters are discharged to the Hampton Roads Sanitation District treatment works.
- 8) An apparent storm water retention pond was observed just outside the fence of IMS and adjacent to the tank farm. IMS staff noted the pond is not connected to IMS. **A flush pipe with valve was observed on the outside of the tank farm berm between the tank farm and the retention pond. The purpose or use of the pipe was unknown.**
- 9) Apparent non-hazardous wastes were observed stored in a three-sided shed and immediately in front of it. **Most of the containers in this area were 55-gallon with non-hazardous waste labels. Many labels did not identify the contents and some containers had no markings or labeling.**
- 10) POL-soaked sorbents were observed in an open-topped roll off container deliberately sloped by placing one end on blocks. The sorbents, which could include gasoline-soaked, are transported off site to Big Bethel landfill, a sanitary landfill. The slope allows POL to drain to one end and be removed and handled through the POL system on site. This sorbents waste stream, combined with the sludge in the next bullet, is analyzed annually to renew the profile for the disposal facility.
- 11) Solids separation is performed in two uncovered, 10,000-gallon concrete, steel-lined (vault) pits. Seams are welded and the pit has concrete curbing and pad sloped toward the pits. Solids are drained and mixed with peanut shells to pass paint filter test. The solidified sludge is then transferred to an open-topped roll off container and transported off site to the Big Bethel Landfill. This waste stream is analyzed annually to renew the profile for the disposal facility. Sources of solids are from tanks, oil/water separators, and ditch cleanups. According to IMS staff, the pits are lowered on Friday afternoons to prevent overflow during weekend, unmanned hours.
- 12) A metal connex shipping container was being used as the hazardous waste transfer facility. The container was marked "Hazard Storage Area". This container did not have power or refrigeration. The container was locked.
- 13) **The container held assorted smaller containers marked as non-hazardous waste, fluorescent lamps loose in a clear bag, assorted materials, and one 30-gallon container labeled as hazardous waste flammable from an Exxon service station, although information on the contents and source were uncertain. The label had a DOT "expiration date" of December 30, 2008.**
- 14) **In addition to the above, three biohazard boxes and at least four apparent regulated medical waste "red" bags were observed in the container. The boxes were not labeled as to contents, generator or dates. An IMS employee stated one box was from Marva Maid, another from work on the vessel, USS Normandy, and the third was unknown. One bag was marked as Marva Maid, dated April 30, 2009. An IMS employee stated the bag contained plastic milk bottles in contact with blood from a Marva Maid person. Another bag was marked "USS Normandy" and described as from the cleanup of vessel sewage tanks. Other bags were in poor condition and no markings were visible without movement of the bags.**

- IMS staff noted that Stericycle, a regulated medical waste transportation firm, picks up the medical waste containers from IMS' location.**
- 15) Hazardous waste containers are transported by IMS trucks from customers to the transfer facility. IMS seeks to fill a transport truck as much as possible before transport off site to the treatment, storage or disposal ("TSD") facility. IMS utilizes most often the TSDs of CycleChem of Lewisberry, Pennsylvania, and/or PSC (formerly Republic) of Hatfield, Pennsylvania.

Issues regarding operation of the hazardous waste transfer facility, including information presented in IMS' 2008 annual report received by DEQ on April 1, 2009 and previously reviewed on April 7, 2009, are addressed under separate cover. The observations regarding apparent regulated medical waste have been provided, along with photos taken on May 12, 2009 by the USEPA staff and this memorandum, to VDEQ Tidewater Regional Office waste compliance staff for further review.

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Norfolk, VA 23501-1779
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Chesapeake, VA 23320

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Fax: (757) 436-5266



March 30, 2009

Ms. Lisa Silvia
Waste Inspector Senior II
Virginia Department of Environmental Quality
Tidewater Regional Office
5636 Southern Boulevard
Virginia Beach, Virginia 23462

RE: IMS Environmental Services, Inc. EPA ID #: VAD041447111

Dear Ms. Silvia:

This correspondence is generated in relation to the 10 day holding times for hazardous waste at our facility. A review of our Hazardous Material Waste Log indicates that drums were not held on our Norfolk facility premises greater than 10 days, without approval.

During 2008, IMS transported 289 manifest loads of hazardous wastes and materials. Review of the 289 manifests identifies 8 loads that reflect the time between Transporter acceptance and Facility receipt exceeded 10 days; however, cross-referencing our Log indicates that these manifested loads were not held on our Norfolk facility premises greater than 10 days. Below is a breakdown of each load that surpassed 10 days between receipt by IMS and delivery to the disposal facility.

- Manifest Number 003691117 JJK – One drum of waste was picked up in Chesapeake, Virginia by IMS on Thursday May 8, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Friday May 16, 2008, 8 days later. The drum was delivered to the disposal facility on Monday May 19, 2008, 11 days from initial pickup.
- Manifest Number 003691131 JJK – Two drums of waste were picked up in Portsmouth, Virginia by IMS on Friday June 27, 2008 and transported to our Norfolk facility. The drums departed our Norfolk facility on Monday July 7, 2008 (4th of July holiday weekend), 8 days later. The drums were delivered to the facility on Monday July 8, 2008, 11 days from initial pickup.

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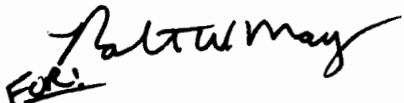
www.imsenv.com

- **Manifest Number 000172486 JJK – One drum of waste was picked up in Newport News, Virginia by IMS on Wednesday September 17, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Sunday September 28, 2008, 11 days later. The drum was delivered to the facility on Thursday October 9, 2008, 22 days from initial pickup.**
- Manifest Number 004470219 JJK – One drum of waste was picked up by IMS on Friday October 10, 2008 from a Wawa Store in Richmond, Virginia. The material remained on the truck until delivery to the facility on Tuesday October 21, 2008, 11 days later.
- Manifest Number 004469569 JJK – One drum of waste was picked up in Portsmouth, Virginia by IMS on Friday October 10, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Monday October 20, 2008, 10 days later. The drum was delivered to the disposal facility on Tuesday October 21, 2008, 11 days from initial pickup.
- Manifest Number 004469572 JJK – One drum of waste was picked up in Virginia Beach, Virginia by IMS on Thursday October 23, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Tuesday October 28, 2008, 5 days later. The drum was delivered to the disposal facility on Monday November 3, 2008, 11 days from initial pickup.
- Manifest Number 004469576 JJK – One drum of waste was picked up in Virginia Beach, Virginia by IMS on Wednesday November 5, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Tuesday November 11, 2008, 6 days later. The drum was delivered to the disposal facility on Monday November 17, 2008, 12 days from initial pickup.
- Manifest Number 004470224 JJK – One drum of waste was picked up by IMS on Wednesday November 5, 2008 from a Wawa Store in Woodbridge, Virginia. The material remained on the truck until delivery to the facility on Monday November 17, 2008, 12 days later.

Ms. Lisa Silvia
Virginia Department of Environmental Quality
IMS Environmental Services, Inc. EPA ID#: VAD041447111
Page 3 of 3

In conclusion, IMS transported 289 manifested loads during 2008 with 8 loads that reflect the time between Transporter acceptance and Facility receipt exceeded 10 days; however, cross-referencing our Log indicates that these manifested loads were not held on our Norfolk facility premises greater than 10 days. Please contact either myself or Robert May with any questions at (757) 436-3000.

Sincerely,
IMS Environmental Services, Inc.


For:
Douglas E. Macnab, CHMM
Project Manager

Mailing Address: P.O. Box 1779
Norfolk, VA 23501-1779
Shipping Address: 929 Professional Place
Chesapeake, VA 23320

24 Hours: (757) 436-3000
1-800-989-4467
Fax: (757) 436-5266



March 30, 2009

Ms. Lisa Silvia
Waste Inspector Senior II
Virginia Department of Environmental Quality
Tidewater Regional Office
5636 Southern Boulevard
Virginia Beach, Virginia 23462



RE: IMS Environmental Services, Inc. EPA ID #: VAD041447111

Dear Ms. Silvia:

This correspondence is generated in relation to the 10 day holding times for hazardous waste at our facility. A review of our Hazardous Material Waste Log indicates that drums were not held on our Norfolk facility premises greater than 10 days, without approval.

During 2008, IMS transported 289 manifest loads of hazardous wastes and materials. Review of the 289 manifests identifies 8 loads that reflect the time between Transporter acceptance and Facility receipt exceeded 10 days; however, cross-referencing our Log indicates that these manifested loads were not held on our Norfolk facility premises greater than 10 days. Below is a breakdown of each load that surpassed 10 days between receipt by IMS and delivery to the disposal facility.

- Manifest Number 003691117 JJK – One drum of waste was picked up in Chesapeake, Virginia by IMS on Thursday May 8, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Friday May 16, 2008, 8 days later. The drum was delivered to the disposal facility on Monday May 19, 2008, 11 days from initial pickup.
- Manifest Number 003691131 JJK – Two drums of waste were picked up in Portsmouth, Virginia by IMS on Friday June 27, 2008 and transported to our Norfolk facility. The drums departed our Norfolk facility on Monday July 7, 2008 (4th of July holiday weekend), 8 days later. The drums were delivered to the facility on Monday July 8, 2008, 11 days from initial pickup.

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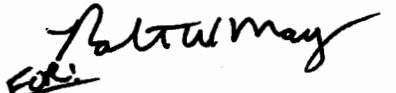
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- **Manifest Number 000172486 JJK – One drum of waste was picked up in Newport News, Virginia by IMS on Wednesday September 17, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Sunday September 28, 2008, 11 days later. The drum was delivered to the facility on Thursday October 9, 2008, 22 days from initial pickup.**
- **Manifest Number 004470219 JJK – One drum of waste was picked up by IMS on Friday October 10, 2008 from a Wawa Store in Richmond, Virginia. The material remained on the truck until delivery to the facility on Tuesday October 21, 2008, 11 days later.**
- **Manifest Number 004469569 JJK – One drum of waste was picked up in Portsmouth, Virginia by IMS on Friday October 10, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Monday October 20, 2008, 10 days later. The drum was delivered to the disposal facility on Tuesday October 21, 2008, 11 days from initial pickup.**
- **Manifest Number 004469572 JJK – One drum of waste was picked up in Virginia Beach, Virginia by IMS on Thursday October 23, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Tuesday October 28, 2008, 5 days later. The drum was delivered to the disposal facility on Monday November 3, 2008, 11 days from initial pickup.**
- **Manifest Number 004469576 JJK – One drum of waste was picked up in Virginia Beach, Virginia by IMS on Wednesday November 5, 2008 and transported to our Norfolk facility. The drum departed our Norfolk facility on Tuesday November 11, 2008, 6 days later. The drum was delivered to the disposal facility on Monday November 17, 2008, 12 days from initial pickup.**
- **Manifest Number 004470224 JJK – One drum of waste was picked up by IMS on Wednesday November 5, 2008 from a Wawa Store in Woodbridge, Virginia. The material remained on the truck until delivery to the facility on Monday November 17, 2008, 12 days later.**

Ms. Lisa Silvia
Virginia Department of Environmental Quality
IMS Environmental Services, Inc. EPA ID#: VAD041447111
Page 3 of 3

In conclusion, IMS transported 289 manifested loads during 2008 with 8 loads that reflect the time between Transporter acceptance and Facility receipt exceeded 10 days; however, cross-referencing our Log indicates that these manifested loads were not held on our Norfolk facility premises greater than 10 days. Please contact either myself or Robert May with any questions at (757) 436-3000.

Sincerely,
IMS Environmental Services, Inc.


For:
Douglas E. Macnab, CHMM
Project Manager

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TRANSPORTER ANNUAL REPORT	
Transporter Name: IMS Environmental Services	Date: 3/31/09
	Virginia Permit Number: VAD0414471115
Address: 1301 Marsh St.	Phone Number: (757) 436-3000
P.O. Box 1779	Reporting Year 2008
Norfolk, VA 23501	

- Hazardous waste originating in Virginia was transported Yes • No •
If yes, indicate shipments on appropriate forms:
 - Shipments within the Commonwealth on Form 7.2-2
 - Shipments from the Commonwealth to other states on Form 7.2-3
 - Shipments into Commonwealth on Form 7.2-4
 - Shipments to foreign facilities on Form 7.2-5
- Please list name and address of designated official in firm who can be contacted on hazardous waste transporter matters (if other than reporting official):

Name: Robert W. May, P.G.	Title: Vice President Mid-Atlantic Region
Address: 1301 Marsh Street	Phone Number: 757-436-3000
Norfolk, VA 23501	
Signature of Reporting Official: <i>Robert W. May</i>	Date: 3/31/09
Title: Vice-President Mid-Atlantic Region	

DEQ Form 7.2-1



SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
12/27/2007	VAR000511121	PAD067098822	01/04/2008	000849153 JJK
01/03/2008	VAR000501965	PAD067098822	01/04/2008	000849125 JJK
01/04/2008	VAR000513515	PAD067098822	01/14/2008	000849127 JJK
01/04/2008	VAR000511113	PAD067098822	01/14/2008	000849128 JJK
01/07/2008	VAR000511105	PAD067098822	01/14/2008	000849129 JJK
01/07/2008	VAD988200424	PAD067098822	01/14/2008	000172470 JJK
01/07/2008	VAD988200424	PAD067098822	01/14/2008	000172453 JJK
01/07/2008	VAR000514067	PAD067098822	01/14/2008	000741777 JJK
01/10/2008	CESQG	PAD067098822	01/14/2008	003691162 JJK
01/11/2008	VAR000500801	PAD067098822	01/14/2008	000849126 JJK
01/11/2008	VAR000511097	PAD067098822	01/14/2008	000849130 JJK
01/11/2008	VAR000511089	PAD067098822	01/14/2008	000849131 JJK
01/11/2008	VAR000502138	PAD067098822	01/21/2008	000849154 JJK
01/14/2008	VAR000507343	PAD067098822	01/21/2008	000741778 JJK
01/15/2008	VAR000514448	PAD067098822	01/21/2008	000741779 JJK
01/15/2008	VAR000509018	PAD067098822	01/21/2008	000849155 JJK
01/16/2008	VAR000018268	PAD067098822	01/21/2008	000849132 JJK
01/18/2008	VAR000506824	PAD067098822	01/21/2008	000849133 JJK
01/18/2008	CESQG	PAD067098822	01/21/2008	003691164 JJK
01/21/2008	VAR000503466	PAD067098822	01/30/2008	000849134 JJK
01/22/2008	VAR000016204	PAD067098822	01/30/2008	000844400 JJK
01/23/2008	VAR000574672	PAD067098822	01/30/2008	000844401 JJK
01/24/2008	VAR000013243	PAD067098822	01/30/2008	000844402 JJK
01/24/2008	VAR000511097	PAD067098822	01/30/2008	000849111 JJK
01/28/2008	CESQG	PAD067098822	01/30/2008	000172472 JJK
02/04/2008	CESQG	PAD067098822	02/07/2008	003691165 JJK
02/04/2008	VAR000511121	PAD067098822	02/07/2008	000741780 JJK
01/30/2008	VAR000501965	PAD067098822	02/07/2008	000844403 JJK
01/30/2008	VAR000511113	PAD067098822	02/07/2008	000844405 JJK
02/05/2008	VAR000503110	PAD067098822	02/07/2008	000844407 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

of Shipment	Number	(or Secondary Transporter) Number	to Facility (or Secondary Transporter)	Number
02/06/2008	VAR000501965	PAD067098822	02/07/2008	000844408 JJK
02/06/2008	VAR000503805	PAD067098822	02/07/2008	000844409 JJK
02/06/2008	VAR000506808	PAD067098822	02/07/2008	000849156 JJK
02/08/2008	VAR000509000	PAD067098822	02/14/2008	000741781 JJK
02/08/2008	VAR000511089	PAD067098822	02/14/2008	000844411 JJK
02/11/2008	VAR000506824	PAD067098822	02/14/2008	000844416 JJK
02/12/2008	VAR000503110	PAD067098822	02/14/2008	000844421 JJK
02/14/2008	CESQG	PAD067098822	02/21/2008	003691167 JJK
02/15/2008	VAR000512509	PAD067098822	02/21/2008	000844422 JJK
02/15/2008	VAR000014688	PAD067098822	02/21/2008	000844423 JJK
02/19/2008	VAR000503789	PAD067098822	02/21/2008	000844424 JJK
02/19/2008	VAR000511139	PAD067098822	02/21/2008	000844425 JJK
02/18/2008	VAR000512418	PAD067098822	02/21/2008	000741782 JJK
02/18/2008	VAR000503870	PAD067098822	02/21/2008	000741783 JJK
02/20/2008	VAR000502120	PAD067098822	02/28/2008	000741784 JJK
02/22/2008	VAD988200424	PAD067098822	02/28/2008	003691168 JJK
02/25/2008	VAR000514067	PAD067098822	02/28/2008	000844426 JJK
02/26/2008	VAR000506824	PAD067098822	02/28/2008	000746150 JJK
02/27/2008	VAR000013235	PAD067098822	03/07/2008	000746152 JJK
02/28/2008	VAR000014217	PAD067098822	02/28/2008	000746151 JJK
03/07/2008	VAD981740558	PAD067098822	03/17/2008	003691109 JJK
03/10/2008	VAR000502138	PAD067098822	03/17/2008	000746148 JJK
03/10/2008	VAR000501064	PAD067098822	03/17/2008	000746153 JJK
03/12/2008	VAR000501478	PAD067098822	03/17/2008	000746155 JJK
03/12/2008	VAR000506824	PAD067098822	03/17/2008	000746156 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

of Shipment	Number	(or Secondary Transporter) Number	to Facility (or Secondary Transporter)	Number
03/14/2008	VAR000509018	PAD067098822	03/24/2008	000741785 JJK
03/18/2008	VAR000502120	PAD067098822	03/24/2008	000741786 JJK
03/18/2008	VAR000500827	PAD067098822	03/24/2008	000746157 JJK
03/18/2008	VAR000502153	PAD067098822	03/24/2008	000746158 JJK
03/19/2008	VAR000514448	PAD067098822	03/24/2008	000746149 JJK
03/20/2008	VAR000014209	PAD067098822	03/24/2008	000746159 JJK
03/20/2008	VAR000513515	PAD067098822	03/24/2008	000746160 JJK
03/21/2008	VAR000514652	PAD067098822	03/24/2008	000746161 JJK
03/24/2008	VAR000511121	PAD067098822	04/03/2008	000746147 JJK
03/24/2008	VAR000512418	PAD067098822	04/03/2008	000746146 JJK
03/26/2008	VAD000016402	PAD987367216	03/28/2008	003691110 JJK
03/26/2008	VAR000013250	PAD067098822	04/03/2008	000746163 JJK
03/27/2008	VAR000506808	PAD067098822	04/03/2008	000746145 JJK
03/28/2008	VAR000511022	PAD067098822	04/03/2008	000746162 JJK
03/28/2008	VAR000016204	PAD067098822	04/03/2008	000746164 JJK
03/31/2008	VAR000506824	PAD067098822	04/03/2008	000746165 JJK
03/31/2008	VAR000503110	PAD067098822	04/03/2008	000746166 JJK
04/01/2008	VAR000014638	PAD067098822	04/03/2008	000746167 JJK
04/03/2008	VAR000507343	PAD067098822	04/11/2008	000746144 JJK
04/04/2008	VAR000503870	PAD067098822	04/11/2008	000844427 JJK
04/09/2008	VAR000512731	PAD067098822	04/11/2008	000844439 JJK
04/08/2008	CESQG	PAD067098822	04/11/2008	003691113 JJK
04/09/2008	CESQG	PAD067098822	04/11/2008	000746168 JJK
04/10/2008	VAR000512426	PAD067098822	04/17/2008	000844428 JJK
04/14/2008	VAR000501064	PAD067098822	04/17/2008	000746169 JJK



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SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
04/14/2008	VAR000503185	PAD067098822	04/17/2008	000844438 JJK
04/14/2008	VAR000512434	PAD067098822	04/17/2008	000746154 JJK
04/14/2008	VAR000514067	PAD067098822	04/17/2008	000844437 JJK
04/21/2008	VAR000515304	PAD067098822	05/01/2008	000844435 JJK
04/22/2008	VAR000505427	PAD067098822	05/01/2008	000746170 JJK
04/22/2008	VAR000014688	PAD067098822	05/01/2008	000746171 JJK
04/22/2008	VAR000506808	PAD067098822	05/01/2008	000844434 JJK
04/22/2008	CESQG	PAD067098822	05/01/2008	003691112 JJK
04/23/2008	VAR000509000	PAD067098822	05/01/2008	000844433 JJK
04/24/2008	VAR000013268	PAD067098822	05/01/2008	000746184 JJK
04/25/2008	VAR000501684	PAD067098822	05/01/2008	000746185 JJK
04/25/2008	VAR000502112	PAD067098822	05/01/2008	000844432 JJK
04/28/2008	VAR000511121	PAD067098822	05/01/2008	000844430 JJK
04/29/2008	VAR000506824	PAD067098822	05/01/2008	000746186 JJK
04/29/2008	VAR000512509	PAD067098822	05/01/2008	000746187 JJK
04/30/2008	CESQG	PAD067098822	05/08/2008	000172487 JJK
04/30/2008	VAR000514448	PAD067098822	05/08/2008	000844431 JJK
05/01/2008	VAP000016526	PAD067098822	05/01/2008	004470646 JJK
05/01/2008	VAR000513515	PAD067098822	05/01/2008	000746188 JJK
05/02/2008	VAR000013268	PAD067098822	05/08/2008	000746197 JJK
05/02/2008	CESQG	PAD067098822	05/08/2008	000172488 JJK
05/02/2008	VAR000503870	PAD067098822	05/08/2008	003691114 JJK
05/02/2008	VAR000507343	PAD067098822	05/08/2008	003691115 JJK
05/05/2008	VAR000502120	PAD067098822	05/08/2008	000746172 JJK



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SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
05/05/2008	VAR000511097	PAD067098822	05/08/2008	000746189 JJK
05/06/2008	CESQG	PAD067098822	05/08/2008	003691116 JJK
05/08/2008	VAD981740558	PAD067098822	05/19/2008	003691117 JJK
05/09/2008	VAR000514652	PAD067098822	05/19/2008	000746198 JJK
05/12/2008	VAR000501965	PAD067098822	05/19/2008	000746199 JJK
05/13/2008	VAR000014688	PAD067098822	05/19/2008	000746200 JJK
05/13/2008	VAD988200424	PAD067098822	05/19/2008	003691118 JJK
05/13/2008	CESQG	PAD067098822	05/19/2008	000172455 JJK
05/14/2008	VAR000503466	PAD067098822	05/19/2008	000746201 JJK
05/14/2008	VAR000503110	PAD067098822	05/19/2008	000746202 JJK
05/15/2008	VAR000500827	PAD067098822	05/19/2008	000746203 JJK
05/15/2008	VAR000506808	PAD067098822	05/19/2008	000746173 JJK
05/20/2008	VAR000512418	NJD000027193	05/29/2008	000746174 JJK
05/20/2008	VAR000013243	NJD000027193	05/29/2008	000746205 JJK
05/20/2008	VAR000512400	NJD000027193	05/29/2008	000746206 JJK
05/20/2008	VAR000511089	NJD000027193	05/29/2008	004470747 JJK
05/22/2008	VAR000512392	NJD000027193	05/29/2008	000746175 JJK
05/23/2008	VAR000506824	NJD000027193	05/29/2008	004470745 JJK
05/23/2008	VAR000514067	NJD000027193	05/29/2008	000746177 JJK
05/23/2008	VAR000504555	NJD000027193	05/29/2008	000746178 JJK
05/29/2008	VAR000511139	NJD000027193	05/29/2008	004470744 JJK
05/28/2008	CESQG	NJD000027193	05/29/2008	002829356 JJK
06/03/2008	VAR000511121	PAD067098822	06/12/2008	000746179 JJK
06/03/2008	VAR000503987	PAD067098822	06/12/2008	004470742 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
06/04/2008	VAR000503185	PAD067098822	06/12/2008	000746180 JJK
06/04/2008	VAR000511105	PAD067098822	06/12/2008	004470739 JJK
06/05/2008	VAR000503870	PAD067098822	06/12/2008	000746176 JJK
06/06/2008	VAR000013235	PAD067098822	06/12/2008	004470738 JJK
06/06/2008	VAR000514652	PAD067098822	06/12/2008	004470736 JJK
06/06/2008	VAR000513515	PAD067098822	06/12/2008	004470737 JJK
06/09/2008	VAR000014688	PAD067098822	06/12/2008	004470735 JJK
06/11/2008	VAR000503789	PAD067098822	06/12/2008	004470734 JJK
06/11/2008	VAR000512392	PAD067098822	06/20/2008	000746181 JJK
06/12/2008	VAR000013250	PAD067098822	06/20/2008	004470732 JJK
06/14/2008	CESQG	PAD067098822	06/20/2008	002829376 JJK
06/16/2008	VAR000503110	PAD067098822	06/20/2008	004470730 JJK
06/17/2008	VAR000511097	PAD067098822	06/20/2008	004470731 JJK
06/19/2008	VAR000506824	PAD067098822	06/20/2008	004470729 JJK
06/18/2008	CESQG	PAD067098822	06/27/2008	003691126 JJK
06/18/2008	CESQG	PAD067098822	06/27/2008	003691127 JJK
06/18/2008	CESQG	PAD067098822	06/27/2008	003691128 JJK
06/18/2008	CESQG	PAD067098822	06/27/2008	003691129 JJK
06/19/2008	VAR000501064	PAD067098822	06/20/2008	004470728 JJK
06/24/2008	VAR000013250	PAD067098822	06/27/2008	004470727 JJK
06/26/2008	VAR000506808	PAD067098822	06/27/2008	000746196 JJK
06/26/2008	VAR000503110	PAD067098822	06/27/2008	004470724 JJK
06/26/2008	VAR000013276	PAD067098822	06/27/2008	004470725 JJK
06/26/2008	VAR000511022	PAD067098822	06/27/2008	004470726 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
06/27/2008	CESQG	PAD067098822	07/08/2008	003691131 JJK
06/30/2008	CESQG	PAD067098822	07/08/2008	003691130 JJK
06/30/2008	VAR000514067	PAD067098822	07/08/2008	000746182 JJK
07/01/2008	VAR000511121	PAD067098822	07/08/2008	000746183 JJK
07/01/2008	VAR000503466	PAD067098822	07/08/2008	004470723 JJK
07/02/2008	VAR000515304	PAD067098822	07/08/2008	000746190 JJK
07/02/2008	VAD981740558	PAD067098822	07/08/2008	003691140 JJK
07/02/2008	VAR000512509	PAD067098822	07/08/2008	004470719 JJK
07/02/2008	VAR000511089	PAD067098822	07/08/2008	004470720 JJK
07/07/2008	VAR000502120	PAD067098822	07/17/2008	000746191 JJK
07/11/2008	CESQG	PAD067098822	07/17/2008	003691119 JJK
07/14/2008	VAR000503810	PAD067098822	07/17/2008	000746192 JJK
07/15/2008	VAR000014688	PAD067098822	07/17/2008	004470717 JJK
07/15/2008	VAR000513515	PAD067098822	07/17/2008	004470718 JJK
07/16/2008	VAR000509018	PAD067098822	07/17/2008	000746194 JJK
07/17/2008	VAR000512426	PAD067098822	07/25/2008	000746195 JJK
07/21/2008	VAR000505110	PAD067098822	07/25/2008	004470716 JJK
07/22/2008	VAR000503805	PAD067098822	07/25/2008	004470715 JJK
07/23/2008	VAR000506824	PAD067098822	07/25/2008	004470714 JJK
07/23/2008	VAR000501965	PAD067098822	07/25/2008	004470713 JJK
07/24/2008	VAR000511113	PAD067098822	07/25/2008	004470712 JJK
07/24/2008	VAR000515304	PAD067098822	08/01/2008	003691132 JJK
07/28/2008	VAD000016469	PAD067098822	08/01/2008	003691133 JJK
07/28/2008	VAD000016469	PAD067098822	08/01/2008	003691134 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
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P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
07/30/2008	VAR000514652	PAD067098822	08/01/2008	004470710 JJK
07/30/2008	VAR000500801	PAD067098822	08/01/2008	004470711 JJK
07/31/2008	VAR000511121	PAD067098822	08/01/2008	004469611 JJK
07/31/2008	VAR000501064	PAD067098822	08/01/2008	004470708 JJK
08/01/2008	VAR000509000	PAD067098822	08/11/2008	004469546 JJK
08/01/2008	VAR000514067	PAD067098822	08/11/2008	004469547 JJK
08/06/2008	VAR000512418	PAD067098822	08/11/2008	004469548 JJK
08/06/2008	VAR000506808	PAD067098822	08/11/2008	004469549 JJK
08/07/2008	VAR000506808	PAD067098822	08/11/2008	004469550 JJK
08/12/2008	VAR000515478	PAD067098822	08/21/2008	004469551 JJK
08/13/2008	VAR000512509	PAD067098822	08/21/2008	004470707 JJK
08/14/2008	VAR000503870	PAD067098822	08/21/2008	004469552 JJK
08/15/2008	VAR000013235	PAD067098822	08/21/2008	004470705 JJK
08/16/2008	VAR000501478	PAD067098822	08/21/2008	004470704 JJK
08/19/2008	VAD981740558	PAD067098822	08/21/2008	003691136 JJK
08/26/2008	VAR000501478	PAD067098822	09/04/2008	004470256 JJK
08/26/2008	VAD988193934	PAD067098822	09/04/2008	003691137 JJK
08/26/2008	VAD988193934	PAD067098822	09/04/2008	003691138 JJK
08/26/2008	VAD988193934	PAD067098822	09/04/2008	003691139 JJK
08/26/2008	VAD988193934	PAD067098822	09/04/2008	003691140 JJK
08/26/2008	VAR000511139	PAD067098822	09/04/2008	004470703 JJK
08/28/2008	VAR000507343	PAD067098822	09/04/2008	004469553 JJK
08/29/2008	VAR000509018	PAD067098822	09/04/2008	004469554 JJK
08/29/2008	VAD981740558	PAD067098822	09/04/2008	003691142 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
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P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
08/31/2008	CESQG	PAD067098822	09/04/2008	003691143 JJK
09/05/2008	VAR000515700	PAD067098822	09/15/2008	004469555 JJK
09/05/2008	VAD005113188	PAD067098822	09/15/2008	000172457 JJK
09/05/2008	VAR000512434	PAD067098822	09/15/2008	004470702 JJK
09/08/2008	VAR000014688	PAD067098822	09/15/2008	004470255 JJK
09/09/2008	VAR000514652	PAD067098822	09/15/2008	004470699 JJK
09/09/2008	VAR000506824	PAD067098822	09/15/2008	004470701 JJK
09/10/2008	VAR000504555	PAD067098822	09/15/2008	004469557 JJK
09/11/2008	VAR000511121	PAD067098822	09/15/2008	004469558 JJK
09/09/2008	VAR000016204	PAD067098822	09/16/2008	004470700 JJK
09/15/2008	VAR000013276	PAD067098822	09/16/2008	004470698 JJK
09/16/2008	VAR000511097	PAD067098822	09/26/2008	004470697 JJK
09/17/2008	VAD988199469	PAD067098822	10/09/2008	000172486 JJK
09/17/2008	VAR000506808	PAD067098822	09/26/2008	004469559 JJK
09/18/2008	VAR000511105	PAD067098822	09/26/2008	004470696 JJK
09/19/2008	VAR000511113	PAD067098822	09/26/2008	004470694 JJK
09/22/2008	VAR000503805	PAD067098822	09/26/2008	004470692 JJK
09/26/2008	VAR000503110	PAD067098822	09/26/2008	004470691 JJK
09/22/2008	VAR000502120	PAD067098822	09/29/2008	004469560 JJK
09/22/2008	VAR000511121	PAD067098822	09/29/2008	004469561 JJK
09/24/2008	VAR000514067	PAD067098822	09/29/2008	004469563 JJK
09/29/2008	VAR000502138	PAD067098822	10/09/2008	004469564 JJK
09/30/2008	VAR000506808	PAD067098822	10/09/2008	004469565 JJK
10/02/2008	VAR000513515	PAD067098822	10/09/2008	004470689 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
10/02/2008	VAR000500827	PAD067098822	10/09/2008	004470690 JJK
10/03/2008	VAR000503789	PAD067098822	10/09/2008	004470688 JJK
10/03/2008	VAR000503870	PAD067098822	10/09/2008	004469567 JJK
10/03/2008	VAR000502120	PAD067098822	10/09/2008	004469568 JJK
10/06/2008	VAR000501965	PAD067098822	10/09/2008	004470687 JJK
10/07/2008	VAR000506824	PAD067098822	10/09/2008	004470686 JJK
10/08/2008	CESQG	PAD067098822	10/09/2008	000172510 JJK
10/10/2008	VAR000503466	PAD067098822	10/21/2008	004470219 JJK
10/10/2008	VAR000514448	PAD067098822	10/21/2008	004469569 JJK
10/11/2008	VAR000511089	PAD067098822	10/21/2008	004470220 JJK
10/15/2008	VAR000501684	PAD067098822	10/21/2008	004470221 JJK
10/16/2008	VAR000506808	PAD067098822	10/21/2008	004469570 JJK
10/17/2008	VAR000511006	PAD067098822	10/21/2008	000172512 JJK
10/17/2008	VAR000511121	PAD067098822	10/21/2008	004469571 JJK
10/20/2008	VAR000501064	PAD067098822	10/21/2008	004470222 JJK
10/20/2008	VAR000503987	PAD067098822	10/21/2008	004470223 JJK
10/20/2008	VAR000516021	PAD067098822	10/21/2008	000172516 JJK
10/23/2008	VAR000515700	PAD067098822	11/03/2008	004469572 JJK
10/24/2008	VAR000512509	PAD067098822	11/03/2008	004470225 JJK
10/27/2008	VAR000515304	PAD067098822	11/03/2008	004469573 JJK
10/28/2008	VAR000502153	PAD067098822	11/03/2008	004470226 JJK
10/28/2008	VAR000512418	PAD067098822	11/03/2008	004470227 JJK
10/28/2008	VAR000509018	PAD067098822	11/03/2008	004469574 JJK
10/30/2008	VAR000509000	PAD067098822	11/03/2008	004469575 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
11/05/2008	VAR000013243	PAD067098822	11/17/2008	004470224 JJK
11/05/2008	VAR000506808	PAD067098822	11/17/2008	004469576 JJK
11/07/2008	VAR000506824	PAD067098822	11/17/2008	004470231 JJK
11/10/2008	VAR000511139	PAD067098822	11/17/2008	004470229 JJK
11/10/2008	VAR000511022	PAD067098822	11/17/2008	004470230 JJK
11/11/2008	VAR000505727	PAD067098822	11/17/2008	004470236 JJK
11/12/2008	VAR000500819	PAD067098822	11/17/2008	004470237 JJK
11/12/2008	CESQG	PAD067098822	11/13/2008	002829378 JJK
11/14/2008	VAR000572426	PAD067098822	11/24/2008	004469577 JJK
11/17/2008	VAR000506824	PAD067098822	11/24/2008	004470238 JJK
11/17/2008	VAR000506808	PAD067098822	11/24/2008	004469578 JJK
11/19/2008	VAR000514067	PAD067098822	11/24/2008	004469579 JJK
11/20/2008	VAR000515304	PAD067098822	11/24/2008	004469580 JJK
11/20/2008	VAD981740558	PAD067098822	11/24/2008	000172515 JJK
11/24/2008	VAR000511089	PAD067098822	11/24/2008	004470239 JJK
11/25/2008	VAR000503185	PAD067098822	12/05/2008	004469581 JJK
11/25/2008	VAR000503870	PAD067098822	12/05/2008	004469582 JJK
12/01/2008	VAR000512491	PAD067098822	12/05/2008	004470240 JJK
12/01/2008	VAR000511097	PAD067098822	12/05/2008	004470241 JJK
12/01/2008	VAR000513515	PAD067098822	12/05/2008	004470242 JJK
12/01/2008	VAR000512392	PAD067098822	12/05/2008	004469585 JJK
12/01/2008	VAR000511121	PAD067098822	12/05/2008	004469586 JJK
12/01/2008	VAR000502112	PAD067098822	12/05/2008	004469587 JJK



DEQ Form 7.2-3

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2008
Reported by: Robert W. May	Title: Vice Presidnet

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
12/02/2008	VAR000507343	PAD067098822	12/05/2008	004469588 JJK
12/05/2008	VAR000500827	PAD067098822	12/15/2008	004470243 JJK
12/05/2008	VAR000514652	PAD067098822	12/15/2008	004470244 JJK
12/09/2008	CESQG	PAD067098822	12/15/2008	000172517 JJK
12/09/2008	VAR000502120	PAD067098822	12/15/2008	004469589 JJK
12/10/2008	VAR000503789	PAD067098822	12/15/2008	004470245 JJK
12/11/2008	VAR000503987	PAD067098822	12/15/2008	004470246 JJK
12/12/2008	VAR000503110	PAD067098822	12/15/2008	004470248 JJK
12/15/2008	VAR000514448	PAD067098822	12/23/2008	004469590 JJK
12/16/2008	VAD968193934	PAD067098822	12/23/2008	000172519 JJK
12/16/2008	VAR000506808	PAD067098822	12/23/2008	004469591 JJK
12/17/2008	VAR000515478	PAD067098822	12/23/2008	004469592 JJK
12/18/2008	VAR000013250	PAD067098822	12/23/2008	004470249 JJK



File - nww
FMS

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

5636 Southern Boulevard, Virginia Beach, Virginia 23462

(757) 518-2000 Fax (757) 518-2103

www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Francis L. Daniel
Regional Director

September 8, 2008

Mr. Robert W. May, PG
Mid-Atlantic Region Manager
IMS Environmental Services Inc.
PO Box 1779
Norfolk, Virginia 23501-1779

RE: EPA ID #VAD041447111(5)
IMS Environmental Services Inc. ("IMS")
1301 Marsh Street
Norfolk

Dear Mr. May:

On June 25, 2008, the US Environmental Protection Agency, Region 3 Office, received an anonymous complaint regarding the referenced facility. The complaint was referred to the Virginia Department of Environmental Quality ("DEQ") Tidewater Regional Office ("TRO") for investigation. The complaint was assigned Pollution Response Program incident response number ("IR") 2009-T-0002 and referred to the DEQ TRO water and hazardous waste compliance staff for further evaluation. The complaint alleged, among other things, falsification of EPA identification numbers for handlers of hazardous waste, exceeding allowable time for storage of hazardous waste, land filling of the property with contaminated material, release of oil waste to the ground, and leaks from an on-site oil waste pit.

It is further noted that the DEQ TRO Waste Program issued a Warning Letter dated January 11, 2008 to the referenced facility for apparent noncompliance with the requirements of a permitted hazardous waste transporter's operation of a transfer facility. IMS responded to the Warning Letter on January 29, 2008 with corrective actions planned or implemented by IMS. The responses satisfied DEQ's request for a plan of corrective action and no additional information was requested. Therefore, DEQ TRO waste compliance staff used the referred complaint as an opportunity to also complete a follow-up inspection to the January 2008 Warning Letter.

On July 3, 2008, DEQ TRO water and hazardous waste compliance staff visited the site to evaluate the complaint allegations, as well as overall compliance with applicable regulations. The DEQ staff toured and reviewed all facility operations, including review of all elements of the complaint. This letter specifically addresses review of the facility's compliance with the Virginia Hazardous Waste Management Regulations ("VHWMR"). Overall, DEQ TRO staff could not support or verify the complaint allegations based on the observations of July 3, 2008. All containers in the transfer facility were labeled appropriately, within ten days of having been received, and the hazardous waste inventory logs correlated with containers observed. In addition, transporter-required shipping paperwork reviewed was in order. Some minor best management practice issues were identified and discussed on site by both compliance staff with IMS representatives. Some of the waste-related issues are further discussed in this letter.

The site operates and maintains a concrete pit for treatment of sludge through phase separation. The process is part of an industrial waste water treatment operation permitted through the Hampton Roads Sanitation District. The liquid portion is transferred to the waste water system, and the solids are further solidified with sawdust to pass a paint filter test. The solidified sludge is then transferred to a roll off container for transport off site. It was suggested during the site visit, as a best management practice, that the roll off container be covered, such as with a tied-down tarp, to prevent rainwater from entering and subsequently leaking from the container.

A container of batteries received from Dominion Power was observed in the non-hazardous waste staging area. It could not be determined from container markings whether the batteries were being managed as hazardous waste for recycling, non-hazardous waste, or universal waste batteries. Better container marking was discussed on site.

Several additional containers in the non-hazardous waste staging area were observed as open, not labeled, and/or the container was in poor condition. Better container marking and management to comply with the VHWMR and the Virginia Solid Waste Management Regulations ("VSWMR") were discussed on site. IMS is reminded that the VSWMR allows for storage of non-putrescible, non-hazardous waste for less than 90 days without a permit in appropriate containers. Better container management throughout the site will reduce the potential for noncompliance with the VHWMR and/or VSWMR, as well as prevent possible spills and releases to the ground.

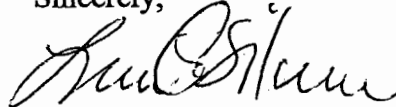
As in previous correspondence, IMS is reminded that when assisting its customers with completion of uniform hazardous waste manifests to ensure correct use and assignment of EPA identification numbers. It was noted during the site visit that the number assigned to the City of Virginia Beach Department of Public Works (Landstown Yard), VAD988200424, may only be used for waste generated at the 3556 Dam Neck Road location and not other city locations. In addition, the City of Chesapeake Northwest River Water Treatment Plant continues to use a temporary number, VAP000016402. This number, issued on February 20, 2007, is no longer valid and was

Mr. Robert W. May, PG
IMS Environmental Services Inc.
September 8, 2008
Page 3 of 3

observed in use on March 26, 2008. While these issues apply to the generator of hazardous waste, as the transporter IMS is better positioned to assist customers who may not be as familiar with the regulatory requirements. DEQ TRO staff is available to assist IMS and its customers in obtaining EPA identification numbers, as well as verifying use of existing numbers.

If you have any questions about the content of this letter, please contact me at (757) 518-2175 or lasilvia@deq.virginia.gov

Sincerely,



Lisa A. Silvia
Waste Inspector Senior II

c: Steve Long, DEQ-TRO (*electronic*)
Melinda Woodruff, DEQ-TRO (*electronic*)
File – IR 2009-T-0002
File – NHW
Kimberlyn Hughes, DEQ, OWTS (*electronic database form only*)

INSP	ENFC	RTC
		N

Page 1

RCRA Evaluation - Violation - Enforcement Form

Rev 8/08 KWH

HANDLER INFORMATION

Handler's EPA ID Number:	VAD041447111	RCRA Non-Notifier:	NO	If YES, the Handler section must be completed.		
Handler's Name:	IMS Environmental Services Inc.					
Physical Address:	1301 Marsh Street	City:	Norfolk	State:	VA	Zip Code: 23501
Mailing Address:	PO Box 1779	City:	Norfolk	State:	VA	Zip Code: 23501-1779
County or City:	NORFOLK CITY	Contact/Title:	Robert May, PG, Mid-Atlantic Region Manager			

Universe Change Required:	NO	Indicate the RCRA Generator Universe Status of a RCRA Non-Notifier:	
Indicate facility's CURRENT Generator Universe:	TRANSPORTER		BOYSNC: YES*
Indicate facility's NEW Generator Universe:			
Indicate Universe identified on the RCRA Grant Work Plan:	Miscellaneous		

Comments:	*BOYSNC, but SNN 3/27/08. Follow-up inspection to 11/19/07 CEI and 1/11/08 119 Enforcement. IR 2009-T-0002. Miscellaneous grant commitment
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Indicate the NEW Transporter Status:	Transporter:		Non-Transporter:		Mode: Air		Rail:		Water:		Highway:	
--------------------------------------	--------------	--	------------------	--	-----------	--	-------	--	--------	--	----------	--

DATA ENTRY INSTRUCTIONS

1. Fill in the facility's **Handler** Information above. The Handler Id and Handler Name will self-populate throughout the entire form.
2. If you are in **Compliance and entering an Inspection**, please go to the **COMPLIANCE** tab and fill in the appropriate information.
3. If you are in **Compliance and entering an Enforcement Action**, please go to Section 4 on the **COMPLIANCE** tab (page C2) and enter the appropriate information.
4. To **Return to Compliance** cited violations, please go to the **COMPLIANCE** tab and check **Yes** for "Is this RTC?" in Section 3 (page C1) and fill in the RTC Dates and Qualifier for the affected Violations.
5. If you are in **Enforcement and entering an Enforcement Action**, please use the **ENFORCEMENT** tab and enter the appropriate information. The violations from the **Compliance** tab are carried over to the **ENFORCEMENT** tab.
6. The **ADDITIONAL DATA** tab contains: **Additional Violations**, **Additional Technical Requirement Milestones**, and **SEP**.

CASE DEREFERRAL MEMORANDUM

To: File
From: Robin J. Schuhmann
Date: March 26, 2008
Re: IMS Environmental Services, Inc.

☒ Permitted Facility. EPA ID #VAD041447111

☐ Complaint.

Referral Date: February 1, 2007 (Notice of Violation)

Location: 1301 Marsh Street, Norfolk, Virginia

Reasons for DEREFERRAL:

IMS Environmental Services, Inc. ("IMS") is a privately owned environmental emergency and response company that works primarily with chemical and petroleum spills and cleanup. IMS owns and operates from a facility located at 1301 Marsh St, Norfolk ("Facility"). IMS is a permitted transporter of hazardous waste under EPA ID#VAD041447111. The IMS permit was reissued on October 7, 2005 after IMS was purchased by Hepaco, Inc; the permit expires on November 9, 2011.

On December 19, 2006 DEQ compliance staff inspected a contractor, LB&B Associates (operates the Navy Craney Island fuel depot), that does business with IMS to transport the contractor's hazardous waste from the Craney Island fuel depot. Records reviewed during the inspection and subsequent records review at the Facility indicated a compliance deficiency of IMS with requirements of the IMS hazardous waste transporter permit:

- On November 29, 2006 IMS transported two 55-gallon drums of waste paint (hazardous waste) for LB&B Associates from Craney Island fuel depot to the IMS facility in Norfolk;
- On December 13, 2006 the two 55-gallon drums of hazardous waste were picked up from IMS by another hazardous waste transporter for final disposal;
- IMS stored the two LB&B 55-gallon drums of hazardous waste paint 14 days;
- A hazardous waste transporter permit (IMS has a transporter permit) only allows storage for 10 days of hazardous waste prior to transport for disposal without an EPA hazardous waste transport, storage, and disposal ("TSD") permit (IMS does not have a TSD permit);
- The IMS storage of the LB&B two 55-gallon drums of hazardous waste paint exceeded the storage limit for transporters of hazardous waste by 4 days (November 29 – December 13, 2006).

On February 1, 2007, DEQ issued a Notice of Violation to IMS for exceeding the 10 days or less storage limit for hazardous waste transporters by 4 days.

DEQ hazardous waste compliance inspected the Facility on November 19, 2007 and there were no reported compliance deficiencies noted during the inspection. DEQ met with IMS on January 29, 2008. During that meeting, IMS identified a series of operational and management actions that had been implemented at the Facility to prevent re-occurrence of exceeding the storage limit of hazardous waste by IMS as a hazardous waste transporter.

This case is recommended for dereferral. It does not appear that IMS was intentionally operating a hazardous waste storage facility, and there were no reports of the two 55-gallon drums of hazardous paint waste being otherwise improperly handled or stored; the potential for environmental harm appears to have been marginal if any.

Recommended by: Robin J. Schuhmann  Date: March 26, 2008

Concurrence:

John M. Bramett
Regional Enforcement Manager

3/26/08
Date

Marion K. Vell
Deputy Regional Director

3/27/08
Date

Frank Samuel
Regional Director

3/27/08
Date

File - N H W

Mailing Address: P.O. Box 1779
Norfolk, VA 23501-1779
Shipping Address: 929 Professional Place
Chesapeake, VA 23320

24 Hours: (757) 436-3000
1-800-989-4467
Fax: (757) 436-5266

IMS
ENVIRONMENTAL
SERVICES

February 19, 2008

Ms. Lisa Silvia
Waste Inspector Senior II
Virginia Department of Environmental Quality
Tidewater Regional Office
5636 Southern Boulevard
Virginia Beach, Virginia 23462

RE: IMS Environmental Services, Inc. EPA ID #: VAD041447111



Dear Ms. Silvia:

This correspondence is generated in relation to the meeting between IMS Environmental Services, Inc (IMS) and the Virginia Department of Environmental Quality on January 29, 2008 and addresses 10 day holding times for hazardous waste at our facility. A review of our Hazardous Material Waste Log indicates that drums were not held on our Norfolk facility premises greater than 10 days.

During 2007, IMS transported 216 manifest loads of hazardous wastes and materials. Review of the 216 manifests identifies 15 loads that reflect the time between Transporter acceptance and Facility receipt exceeded 10 days; however, cross-referencing our Log indicates that these manifested loads were not held on our Norfolk facility premises greater than 10 days. Below is a breakdown of each load that surpassed 10 days between receipt by IMS and delivery to the disposal facility.

- Manifest Number 000741752 JJK – One drum of material was picked up by IMS on January 12, 2007 from a Wawa Store in Woodbridge, Virginia. The material remained on the truck until delivery to the facility on January 25, 2007, 13 days later.
- Manifest Numbers 000747221 JJK through 000747226 JJK. This material was picked up in Richmond and Fredericksburg. Manifest number 000747221 JJK was picked up on Monday February 5, 2007 and manifest numbers 000747222 JJK through 000747226 JJK were picked up on Friday February 9, 2007. The material remained on the truck until delivery to the facility on February 20, 2007, 15 days later for manifest number 000747221 JJK and 11 days later for manifests 000747222 JJK through 000747226 JJK.

IMS ENVIRONMENTAL SERVICES, INC. IS A WHOLLY OWNED SUBSIDIARY OF **HEPACO**, INC.

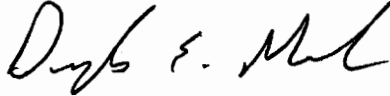
Environmental Consulting and Remediation Contracting • Oil and Hazardous Materials Emergency Response
Tank and Pipeline Cleaning, Testing, Removal, Installation, and Repairs • Health and Safety Consulting, Training,
and Exercises • Industrial Cleaning and Vacuum Truck Services • Construction/Demolition • Marine Salvage

- Manifest Number 000743350 JJK – One drum of material was picked up in Richmond by IMS on Saturday May 26, 2007 of Memorial Day weekend from a Wawa Store in Richmond, Virginia. The material remained on the truck until delivery to the facility on Thursday June 7, 2007, 12 days later.
- Manifest Number 000743378 JJK – One drum of material was picked up by IMS on Friday July 27, 2007 from a Wawa Store in Richmond, Virginia. The material remained on the truck until delivery to the facility on Tuesday August 7, 2007, 11 days later.
- Manifest Number 000172424 JJK – One drum of material was picked up in Chesapeake, Virginia by IMS on Friday July 27, 2007 and transported to our Norfolk facility. The material left our Norfolk facility on Friday August 3, 2007, 7 days later. And was delivered to the facility on Tuesday August 7, 2007, 11 days from initial pickup.
- Manifest Numbers 000741765 JJK and 000741766 JJK were picked up and transported to our Norfolk facility on Friday August 31, 2007 of Labor Day Weekend. The material left our Norfolk facility on Friday September 7, 2007, 7 days later. And was delivered to the facility on Tuesday September 11, 2007, 11 days from initial pickup.
- Manifest Number 000743398 JJK – One drum of material was picked up by IMS on Friday August 31, 2007 of Labor Day Weekend from a Wawa Store in Gainesville, Virginia. The material remained on the truck until delivery to the facility on Tuesday September 11, 2007, 11 days later.
- Manifest Number 000741770 JJK was picked up and transported to our Norfolk facility on Thursday October 25, 2007. The material left our Norfolk facility on Friday November 2, 2007, 8 days later. And was delivered to the facility on Monday November 5, 2007, 11 days from initial pickup.
- Manifest Number 003691157 JJK was picked up and transported to our Norfolk facility on Thursday October 25, 2007. The material left our Norfolk facility on Wednesday November 7, 2007, 8 days later. And was delivered to the facility on Friday November 16, 2007, 17 days from initial pickup.
- Manifest Number 000849122 JJK – One drum of material was picked up by IMS on Friday December 14, 2007 from a Wawa Store in Richmond, Virginia. The material remained on the truck until delivery to the facility on Thursday December 27, 2007, 13 days later. Delays in delivery to the facility were due to the Christmas holidays.

Ms. Lisa Silvia
Virginia Department of Environmental Quality
IMS Environmental Services, Inc. EPA ID#: VAD041447111
Page 3 of 3

In conclusion, IMS transported 216 manifested loads during 2007 with 15 loads that reflect the time between Transporter acceptance and Facility receipt exceeded 10 days; however, cross-referencing our Log indicates that these manifested loads were not held on our Norfolk facility premises greater than 10 days. Please contact either myself or Robert May with any questions at (757) 436-3000.

Sincerely,
IMS Environmental Services, Inc.



Douglas E. Macnab, CHMM
Project Manager

IMS ENVIRONMENTAL SERVICES, INC. IS A WHOLLY OWNED SUBSIDIARY OF **HEPACO** INC.
Environmental Consulting and Remediation Contracting ▪ Oil and Hazardous materials Emergency Response ▪
Tank and Pipeline Cleaning, Testing, Removal, Installation, and Repairs ▪ Health and Safety Consulting, Training,
and Exercises ▪ Industrial Cleaning and Vacuum Truck Services ▪ Construction/Demolition ▪ Marine Salvage

www.imsenv.com

COPY

TRANSPORTER ANNUAL REPORT

Transporter Name: IMS Environmental Services, Inc.	Date: February 19, 2008
Address: 1301 Marsh St. P.O. Box 1779 Norfolk, VA 23523	Virginia Permit Number: VAD0414471115 Phone Number: (757) 543-5718 Reporting Year: <u>2007</u>

1. Hazardous waste originating in Virginia was transported Yes X No
 If yes, indicate shipments on appropriate forms:
- a. Shipments within the Commonwealth of Virginia on Form 7.2-2
 - b. Shipments from the Commonwealth to other states on Form 7.2-3
 - c. Shipments into Commonwealth on Form 7.2-4
 - d. Shipments to foreign facilities on Form 7.2-5
2. Please list name and address of designated official in firm who can be contacted on hazardous waste transporter matters (if other than reporting official):



Name: Robert W. May	Title: Vice President Mid-Atlantic Region
Address: IMS Environmental Services, Inc. 1301 Marsh Street Norfolk, VA 23501	Phone Number: (757) 543-5718
Signature of Reporting Official: 	Date: <u>2/19/08</u>
Title: Vice President Mid-Atlantic Region	



DEQ Form 7.2-1

INTRA-COMMONWEALTH SHIPMENTS

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: <u>2006</u>
Reported by: Robert W. May	Title: Regional Manager

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
None				

SHIPMENTS TO OTHER STATES

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: <u>2007</u>
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
1/2/2007	VAR000501064	PAD067098822	1/3/2007	000742176 JJK
1/2/2007	VAR000511139	PAD067098822	1/3/2007	000742177 JJK
1/2/2007	VAR000509000	PAD067098822	1/11/2007	000741759 JJK
1/2/2007	VAR000503185	PAD067098822	1/11/2007	000741758 JJK
1/3/2007	VAR000511097	PAD067098822	1/11/2007	000742178 JJK
1/5/2007	VAR000013243	PAD067098822	1/11/2007	000741729 JJK
1/10/2007	VAR000502153	PAD067098822	1/11/2007	000741731 JJK
1/10/2007	VAR000503870	PAD067098822	1/11/2007	000741760 JJK
1/12/2007	VAR000013243	PAD067098822	1/25/2007	000741752 JJK
1/15/2007	VAR000511089	PAD067098822	1/25/2007	000741753 JJK
1/17/2007	VAR000501965	PAD067098822	1/25/2007	000741754 JJK
1/18/2007	VAR000506808	PAD067098822	1/25/2007	000741732 JJK
1/23/2007	VAR000511022	PAD067098822	1/25/2007	000741755 JJK
1/24/2007	VAR000013243	PAD067098822	1/25/2007	000747215 JJK
1/25/2007	VAR000512418	PAD067098822	2/1/2007	000741730 JJK
1/26/2007	VAR000509018	PAD067098822	2/1/2007	000741733 JJK
1/26/2007	VAR000500801	PAD067098822	2/1/2007	000747216 JJK
1/26/2007	CESQG	PAD065690592	1/26/2007	000295014 JJK
1/26/2007	CESQG	PAD065690592	1/26/2007	000295015 JJK
1/26/2007	VAR000503987	PAD067098822	2/1/2007	000747218 JJK
1/26/2007	VAR000512491	PAD067098822	2/1/2007	000747219 JJK
1/29/2007	VAR000506824	PAD067098822	2/1/2007	000747217 JJK
1/30/2007	VAR000501684	PAD067098822	2/1/2007	000747220 JJK
1/30/2007	VAD981740558	PAD067098822	2/1/2007	000172403 JJK

SHIPMENTS TO OTHER STATES

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2007
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

of Shipment	Number	(or Secondary Transporter) Number	to Facility (or Secondary Transporter)	Number
2/5/2007	VAR000502153	PAD067098822	2/20/2007	000747221 JJK
2/9/2007	VAR000511022	PAD067098822	2/20/2007	000747222 JJK
2/9/2007	VAR000503110	PAD067098822	2/20/2007	000747223 JJK
2/9/2007	VAR000503789	PAD067098822	2/20/2007	000747224 JJK
2/9/2007	VAR000501478	PAD067098822	2/20/2007	000747225 JJK
2/9/2007	VAR000013227	PAD067098822	2/20/2007	000747226 JJK
2/12/2007	VAR000014688	PAD067098822	2/20/2007	000747227 JJK
2/13/2007	VAR000501064	PAD067098822	2/20/2007	000747228 JJK
2/22/2007	VAR000013243	PAD067098822	3/2/2007	000747230 JJK
2/23/2007	VAR000505727	PAD067098822	3/2/2007	000747231 JJK
2/27/2007	VAR000511139	PAD067098822	3/2/2007	000747232 JJK
2/28/2007	VAR000503987	PAD067098822	3/2/2007	000747234 JJK
3/3/2007	VAR000509000	PAD067098822	3/12/2007	000747236 JJK
3/5/2007	VAR000500827	PAD067098822	3/12/2007	000747235 JJK
3/8/2007	VAR000502153	PAD067098822	3/12/2007	000747237 JJK
3/9/2007	VAR000501478	PAD067098822	3/12/2007	000747238 JJK
3/12/2007	VAR000503870	PAD067098822	3/12/2007	000741735 JJK
3/12/2007	VAR000503805	PAD067098822	3/12/2007	000747239 JJK
3/13/2007	VAR000506824	PAD067098822	3/22/2007	000747241 JJK
3/19/2007	VAR000507343	PAD067098822	3/27/2007	000741736 JJK
3/21/2007	VAR000509000	PAD067098822	3/27/2007	000741737 JJK
3/21/2007	VAR000501965	PAD067098822	3/27/2007	000741738 JJK
3/26/2007	VAR000503185	PAD067098822	4/4/2007	000741739 JJK
3/26/2007	VAR000503789	PAD067098822	4/4/2007	000747243 JJK
3/26/2007	VAR000511097	PAD067098822	4/4/2007	000747244 JJK



SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2007
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities
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of Shipment	Number	(or Secondary Transporter) Number	to Facility (or Secondary Transporter)	Number
3/27/2007	VAR000014688	PAD067098822	4/4/2007	000747245 JJK
3/27/2007	VAD981740558	PAD067098822	4/4/2007	000172404 JJK
3/28/2007	VAR000503466	PAD067098822	4/4/2007	000747246 JJK
3/30/2007	CESQG	PAD067098822	4/4/2007	000172405 JJK
3/30/2007	VAR000506808	PAD067098822	4/4/2007	000741740 JJK
3/30/2007	VAR000510418	PAD067098822	4/4/2007	000741741 JJK
4/2/2007	VAR000503110	PAD067098822	4/4/2007	000747247 JJK
4/3/2007	VAR000013276	PAD067098822	4/4/2007	000747248 JJK
4/5/2007	VAR000504555	PAD067098822	4/13/2007	000741742 JJK
4/11/2007	VAR000509018	PAD067098822	4/16/2007	000741743 JJK
4/12/2007	VAR000502112	PAD067098822	4/16/2007	000741744 JJK
4/5/2007	VAR000511089	PAD067098822	4/13/2007	000747249 JJK
4/9/2007	VAR000013243	PAD067098822	4/16/2007	000747250 JJK
4/9/2007	VAR000500819	PAD067098822	4/16/2007	000747251 JJK
4/10/2007	VAR000014217	PAD067098822	4/16/2007	000747254 JJK
4/10/2007	VAR000503987	PAD067098822	4/16/2007	000747255 JJK
4/17/2007	CESQG	NCD049773245	4/18/2007	000172406 JJK
4/18/2007	VAR000509000	PAD067098822	4/26/2007	000741745 JJK
4/23/2007	VAR000511089	PAD067098822	4/26/2007	000743361 JJK
4/27/2007	VAR000507343	PAD067098822	5/7/2007	000741746 JJK
4/27/2007	VAR000501064	PAD067098822	5/7/2007	000743359 JJK
4/30/2007	VAR000511113	PAD067098822	5/7/2007	000743356 JJK
4/30/2007	VAR000013235	PAD067098822	5/7/2007	000743357 JJK
4/30/2007	VAR000502153	PAD067098822	5/7/2007	000743358 JJK
5/3/2007	VAR000014209	PAD067098822	5/7/2007	000743353 JJK

SHIPMENTS TO OTHER STATES

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2007
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
5/2/2007	VAR000506824	PAD067098822	5/7/2007	000743355 JJK
5/2/2007	VAR000014217	PAD067098822	5/7/2007	000743354 JJK
5/8/2007	CESQG	PAD067098822	5/18/2007	000172407 JJK
5/9/2007	VAR000503466	PAD067098822	5/18/2007	000743352 JJK
5/15/2007	VAR000502138	PAD067098822	5/18/2007	000741747 JJK
5/16/2007	VAR00509240	PAD067098822	5/18/2007	000172408 JJK
5/16/2007	VAR000511121	PAD067098822	5/18/2007	000741748 JJK
5/16/2007	VAR000504555	PAD067098822	5/18/2007	000741749 JJK
5/17/2007	CESQG	PAD067098822	5/24/2007	000172439 JJK
5/17/2007	CESQG	PAD067098822	5/18/2007	000172407 JJK
5/22/2007	VAR000509000	PAD067098822	5/24/2007	000741750 JJK
5/22/2007	VAR000503870	PAD067098822	5/24/2007	000741751 JJK
5/22/2007	VAR000512507	PAD067098822	5/24/2007	000743351 JJK
5/26/2007	VAR000511022	PAD067098822	6/7/2007	000743350 JJK
5/30/2007	VAR000512400	PAD067098822	6/7/2007	000743349 JJK
6/5/2007	CESQG	PAD067098822	6/7/2007	000172427 JJK
6/6/2007	VA4570024477	PAD067098822	6/7/2007	000743784 JJK
6/7/2007	VAR000511139	PAD067098822	6/7/2007	000743348 JJK
6/8/2007	VAR000502153	PAD067098822	6/14/2007	000743346 JJK
6/8/2007	VAR000503789	PAD067098822	6/14/2007	000743347 JJK
6/8/2007	VAR000500827	PAD067098822	6/14/2007	000743368 JJK
6/11/2007	VAR000500827	PAD067098822	6/14/2007	000743363 JJK
6/11/2007	VAR000503805	PAD067098822	6/14/2007	000743365 JJK
6/11/2007	VAR000503110	PAD067098822	6/14/2007	000743366 JJK

SHIPMENTS TO OTHER STATES

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: <u>2007</u>
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
6/11/2007	VAR000512434	PAD067098822	6/14/2007	000743367 JJK
6/11/2007	VAR000512413	PAD067098822	6/21/2007	000741761 JJK
6/13/2007	VAR000502120	PAD067098822	6/21/2007	000741762 JJK
6/15/2007	VAR000507343	PAD067098822	6/21/2007	000741763 JJK
6/19/2007	VAR000503466	PAD067098822	6/21/2007	000743362 JJK
6/19/2007	VAR000501965	PAD067098822	6/21/2007	000743364 JJK
6/25/2007	CESQG	PAD067098822	7/5/2007	000172425 JJK
6/26/2007	VAR000511113	PAD067098822	6/29/2007	000743371 JJK
6/27/2007	VAR000513515	PAD067098822	6/29/2007	000743370 JJK
6/22/2007	VAR000013235	PAD067098822	6/29/2007	000743374 JJK
6/26/2007	VAR000501684	PAD067098822	6/29/2007	000743372 JJK
6/27/2007	VAR000503570	PAD067098822	7/5/2007	000849135 JJK
7/2/2007	VAR000509000	PAD067098822	7/5/2007	000849136 JJK
7/3/2007	VAR000511105	PAD067098822	7/5/2007	000743369 JJK
7/3/2007	VAD988193934	PAD067098822	7/12/2007	000172409 JJK
7/3/2007	VAD988193934	PAD067098822	7/12/2007	000172410 JJK
7/6/2007	VAR000509018	PAD067098822	7/12/2007	000849137 JJK
7/17/2007	VAR000504555	PAD067098822	7/26/2007	000849138 JJK
7/17/2007	VAR000501684	PAD067098822	7/26/2007	000743385 JJK
7/18/2007	CESQG	PAD067098822	7/26/2007	000172411 JJK
7/19/2007	VAR000511113	PAD067098822	7/26/2007	000743384 JJK
7/19/2007	VAR000506808	PAD067098822	7/26/2007	000849139 JJK
7/20/2007	VAD988200424	PAD067098822	7/26/2007	000172413 JJK

SHIPMENTS TO OTHER STATES

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: <u>2007</u>
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
7/20/2007	CESQG	PAD067098822	7/26/2007	000172415 JJK
7/20/2007	VAD988200424	PAD067098822	7/26/2007	000172412 JJK
7/20/2007	VAR000503185	PAD067098822	7/26/2007	000849140 JJK
7/23/2007	VAR000506824	PAD067098822	7/26/2007	000743382 JJK
7/24/2007	VAR000014217	PAD067098822	7/26/2007	000743379 JJK
7/24/2007	VAR000514067	PAD067098822	7/26/2007	000849141 JJK
7/27/2007	VAR000501064	PAD067098822	8/7/2007	000743378 JJK
7/27/2007	VAD981740558	PAD067098822	8/7/2007	000172424 JJK
8/1/2007	VAR000014688	PAD067098822	8/7/2007	000743376 JJK
8/3/2007	VAR000511113	PAD067098822	8/7/2007	000743391 JJK
8/6/2007	VAR000503987	PAD067098822	8/7/2007	000743390 JJK
8/13/2007	VAR000512509	PAD067098822	8/23/2007	000743389 JJK
8/15/2007	VAR000503110	PAD067098822	8/23/2007	000743387 JJK
8/17/2007	VAR000503110	PAD067098822	8/23/2007	000743386 JJK
8/21/2007	VAD074716793	PAD067098822	8/31/2007	000172416 JJK
8/21/2007	VAR000514067	PAD067098822	8/31/2007	000849142 JJK
8/22/2007	VAR000511113	PAD067098822	8/23/2007	000743401 JJK
8/22/2007	VAR000511097	PAD067098822	8/23/2007	000743402 JJK
8/22/2007	VAD988200424	PAD067098822	8/31/2007	000172417 JJK
8/22/2007	CESQG	PAD067098822	8/31/2007	000172421 JJK
8/23/2007	VAR000503870	PAD067098822	8/31/2007	000741764 JJK
8/24/2007	VAR000014688	PAD067098822	8/31/2007	000747229 JJK
8/24/2007	VAR000512418	PAD067098822	8/31/2007	000849143 JJK
8/28/2007	VAR000016204	PAD067098822	8/31/2007	000743400 JJK

SHIPMENTS TO OTHER STATES	
Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2007
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities
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Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
8/28/2007	VAR000501965	PAD067098822	8/31/2007	000747242 JJK
8/30/2007	CESQG	PAD067098822	8/31/2007	002829354 JJK
8/31/2007	VAR000512426	PAD067098822	9/11/2007	000741765 JJK
8/31/2007	VAR000507343	PAD067098822	9/11/2007	000741766 JJK
8/31/2007	VAR000511105	PAD067098822	9/11/2007	000743398 JJK
9/5/2007	VAD981740558	PAD067098822	9/15/2007	000172419 JJK
9/8/2007	VAR000502138	PAD067098822	9/18/2007	000849145 JJK
9/9/2007	VAR000511121	PAD067098822	9/18/2007	000849144 JJK
9/10/2007	VAR000501965	PAD067098822	9/11/2007	000743397 JJK
9/11/2007	VAR000506824	PAD067098822	9/11/2007	000743395 JJK
9/17/2007	VAR000504018	PAD067098822	9/18/2007	000743396 JJK
9/17/2007	VAR000504555	PAD067098822	9/18/2007	000849146 JJK
9/17/2007	CESQG	PAD067098822	9/27/2007	000172420 JJK
9/18/2007	VAR000501064	PAD067098822	9/27/2007	000743394 JJK
9/19/2007	CESQG	PAD067098822	9/27/2007	000172418 JJK
9/25/2007	VAR000503466	PAD067098822	9/27/2007	000743392 JJK
9/25/2007	VAR000509000	PAD067098822	9/27/2007	000849147 JJK
9/26/2007	VAR000502120	PAD067098822	9/27/2007	000741767 JJK
9/27/2007	VAR000014688	PAD067098822	9/27/2007	000743412 JJK
10/1/2007	VAR000512509	PAD067098822	10/8/2007	000743409 JJK
10/1/2007	VAR000502153	PAD067098822	10/8/2007	000743410 JJK
10/1/2007	VAR000513515	PAD067098822	10/8/2007	000743411 JJK
10/3/2007	CESQG	PAD067098822	10/8/2007	000172422 JJK
10/5/2007	VAR000501684	PAD067098822	10/8/2007	000743405 JJK

SHIPMENTS TO OTHER STATES

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: <u>2007</u>
Reported by: Robert W. May	Title: Vice President

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
10/5/2007	VAR000500827	PAD067098822	10/8/2007	000743406 JJK
10/7/2007	VAR000501965	PAD067098822	10/8/2007	000743407 JJK
10/8/2007	VAR000013235	PAD067098822	10/18/2007	000743404 JJK
10/9/2007	VAR000502138	PAD067098822	10/18/2007	000849148 JJK
10/11/2007	VAR000503805	PAD067098822	10/18/2007	000743403 JJK
10/12/2007	VAR000013243	PAD067098822	10/18/2007	000747257 JJK
10/15/2007	VAR000013227	PAD067098822	10/18/2007	000747261 JJK
10/15/2007	VAR000503987	PAD067098822	10/18/2007	000747262 JJK
10/18/2007	VAR000511097	PAD067098822	10/26/2007	000747263 JJK
10/18/2007	VAR000506808	PAD067098822	10/26/2007	000741768 JJK
10/23/2007	VAR000503185	PAD067098822	10/26/2007	000741769 JJK
10/23/2007	VAR000511113	PAD067098822	10/31/2007	000747264 JJK
10/23/2007	VAR000501064	PAD067098822	10/26/2007	000747265 JJK
10/23/2007	VAR000511139	PAD067098822	10/26/2007	000849097 JJK
10/23/2007	CESQG	PAD067098822	10/26/2007	003691156 JJK
10/25/2007	VAD070024722	PAD067098822	10/26/2007	000847447 JJK
10/25/2007	VAR000502120	PAD067098822	11/5/2007	000741770 JJK
10/26/2007	VAR000509018	PAD067098822	11/5/2007	000741771 JJK
10/30/2007	VAR000502112	PAD067098822	11/5/2007	000741772 JJK
11/1/2007	VAR000505727	PAD067098822	11/5/2007	000849099 JJK
10/30/2007	VAD981740558	PAD067098822	11/16/2007	003691157 JJK
11/6/2007	VAR000512731	PAD067098822	11/16/2007	000849102 JJK
11/6/2007	VAR000511113	PAD067098822	11/16/2007	000849101 JJK
11/7/2007	CESQG	PAD067098822	11/16/2007	003691158 JJK

SHIPMENTS TO OTHER STATES

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: <u>2007</u>
Reported by: Robert W. May	Title: Vice Presidnet

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
11/13/2007	VAR000506524	PAD067098822	11/16/2007	000849104 JJK
11/15/2007	VAR000514067	PAD067098822	11/16/2007	000741773 JJK
11/15/2007	VAR000501965	PAD067098822	11/16/2007	000741774 JJK
11/19/2007	VAR000509000	PAD067098822	11/26/2007	000741775 JJK
11/23/2007	VAR000014688	PAD067098822	11/26/2007	000849106 JJK
11/27/2007	VAR000503789	PAD067098822	12/6/2007	000849107 JJK
11/27/2007	VAR000512400	PAD067098822	12/6/2007	000849108 JJK
11/27/2007	VAR000013276	PAD067098822	12/6/2007	000849109 JJK
11/30/2007	VAR000500827	PAD067098822	12/6/2007	000849110 JJK
12/4/2007	VAR000511022	PAD067098822	12/6/2007	000849112 JJK
12/4/2007	VAR000503110	PAD067098822	12/6/2007	000849113 JJK
12/5/2007	VAR000013250	PAD067098822	12/6/2007	000849114 JJK
12/6/2007	VA1170024722	NJ0000027193	12/6/2007	000844359 JJK
12/4/2007	VAR000507343	PAD067098822	12/13/2007	000741776 JJK
12/7/2007	VAR000501478	PAD067098822	12/13/2007	000849120 JJK
12/7/2007	VAR000502153	PAD067098822	12/13/2007	000849121 JJK
12/7/2007	VAR000503870	PAD067098822	12/13/2007	000849150 JJK
12/13/2007	VAR000503987	PAD067098822	12/13/2007	000849151 JJK
12/14/2007	VAR000501064	PAD067098822	12/27/2007	000849122 JJK
12/18/2007	VAR000501634	PAD067098822	12/27/2007	000849098 JJK
12/20/2007	VAR000504555	PAD067098822	12/27/2007	000849152 JJK
12/20/2007	CESQG	PAD067098822	12/27/2007	003691163 JJK
12/21/2007	VAR000500827	PAD067098822	12/27/2007	000849124 JJK
12/22/2007	VAR000506824	PAD067098822	12/27/2007	000849123 JJK



SHIPMENTS INTO THE COMMONWEALTH

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: <u>2006</u>
Reported by: Robert W. May	Title: Regional Manager

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
None				

SHIPMENTS TO FOREIGN FACILITIES

Transporter Name: IMS Environmental Services, Inc.	EPA ID Number: VAD041447111
Address: 1301 Marsh St.	Virginia Transporter Permit Number: VAD0414471115
P.O. Box 1779	Phone Number: (757) 543-5718
Norfolk, VA 23523	Reporting Year: 2007
Reported by: Robert W. May	Title: Regional Manager

Report Hazardous Waste Transportation Activities

Date of Receipt of Shipment	Generator ID Number	Facility ID (or Secondary Transporter) Number	Date Released to Facility (or Secondary Transporter)	Manifest Number
None				

Mailing Address: P.O. Box 1779
Norfolk, VA 23501-1779
Shipping Address: 929 Professional Place
Chesapeake, VA 23320

24 Hours: (757) 436-3000
1-800-989-4467
Fax: (757) 436-5266

File - NHA
FMS

IMS

ENVIRONMENTAL
SERVICES

January 29, 2008

Ms. Lisa A. Silvia
Waste Inspector Senior II
Virginia Department of Environmental Quality
Tidewater Regional Office
5636 Southern Boulevard
Virginia Beach, VA 23462

Sent Via Hand-Delivery



RE: Warning Letter dated January 11, 2008 for EPA ID #VAD041447111

Dear Ms. Silvia:

This correspondence is generated in relation to a Warning Letter signed by you and dated January 11, 2008. The Warning Letter requested a written corrective action plan and attendance to a meeting with VDEQ representatives on January 29, 2008.

The Warning Letter cites several observations, additional notes, and areas of concern related to EPA ID #VAD041447111. As previously provided by written communication, since the limited asset purchase of the former Industrial Marine Service, Inc., the new corporation of IMS Environmental Services, Inc. has undergone new corporate management. With the new corporate management structure, personnel have changed. The present management has taken continued action to improve hazardous waste operations and focused on hazardous waste compliance. IMS is dedicated to continual improvement to our operations and our compliance record.

IMS has been focusing on personnel and processes and procedures as areas to improve or change in order to improve operations and compliance. Since the new corporation and the new management, individual employees responsible with the handling, manifesting, and transporting of hazardous waste gradually changed by either separation of employment or reassignment of responsibilities. Due to the recommendation of the VDEQ inspector, Ms. Lisa Silvia, IMS employees assigned with hazardous waste responsibilities have received additional external training related to RCRA and DOT regulatory requirements. A training event was coordinated in March 2006 by HEPACO, Inc. in conjunction with the University of North Carolina Occupational Safety & Health Educational Resource Center. Additional training was provided in March 2007 to our personnel by North Carolina State University. Copies of training certificates are provided as an attachment.

IMS ENVIRONMENTAL SERVICES, INC. IS A WHOLLY OWNED SUBSIDIARY OF HEPACO, INC.

Environmental Consulting and Remediation Contracting ▪ Oil and Hazardous Materials Emergency Response
Tank and Pipeline Cleaning, Testing, Removal, Installation, and Repairs ▪ Health and Safety Consulting, Training,
and Exercises ▪ Industrial Cleaning and Vacuum Truck Services ▪ Construction/Demolition ▪ Marine Salvage

Ms. Lisa A. Silvia
Virginia Department of Environmental Quality
January 29, 2008
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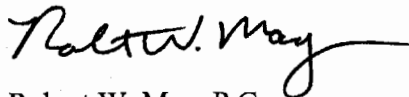
Another management improvement action was the re-assignment of primary personnel responsible for handling, manifesting, and transporting hazardous waste. In the Tidewater region, the primary responsibility for coordinating hazardous waste transportation and disposal was shifted to Mr. Doug Macnab, CHMM. In most instances, Mr. Macnab provides coordination oversight for hazardous waste transportation and disposal actions within the Tidewater region.

Another management improvement action was the business decision to lessen the dependency on outsourced Transporter 2 services. IMS has shifted most hazardous waste transportation from an outsourced task to an in-house task. This shift in transportation reliance has improved the transportation time for hazardous waste.

In summary, IMS Environmental Services, Inc. is a new corporation and operated by new management and has recognized past inadequacies brought forth by the VDEQ. While the new IMS Environmental Services, Inc. operates the same hazardous waste transporter permit, several important circumstances have changed. Changes pertaining to the operation of the permit include new management, change of particular employees involved with permit, implementation of better waste management practices, new employee hiring, additional training, and the re-assignment of personnel responsible for the handling, manifesting, and transportation of hazardous waste. The execution and maintenance of the permit VAD041447111 is steadily improving. The expectation and goals for the future execution and maintenance of the permit shall be to eliminate manifesting documentation errors, to eliminate exceeding holding times, continuing training education efforts related to RCRA and DOT requirements, and ultimately full permit compliance while we serve the community.

Sincerely,

IMS ENVIRONMENTAL SERVICES, INC.



Robert W. May, P.G.
Mid-Atlantic Region Manager
IMS Environmental Services, Inc.

c: Ron L. Horton, Jr., HEPACO, Inc. and IMS Environmental Services, Inc.



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

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Secretary of Natural Resources

David K. Paylor
Director

Francis L. Daniel
Regional Director

January 11, 2008

Mr. Robert W. May, PG
Mid-Atlantic Region Manager
IMS Environmental Services, Inc.
PO Box 1779
Norfolk, Virginia 23501-1779

WARNING LETTER

RE: EPA ID #VAD041447111
IMS Environmental Services, Inc., Norfolk

Dear Mr. May:

The Department of Environmental Quality ("DEQ" or "the Department") has reason to believe that the referenced facility may have been in violation of the Waste Management Law and Regulations.

This letter addresses conditions at the facility named above, and also cites compliance requirements of the Waste Management Law and Regulations. Pursuant to Va. Code § 10.1-1455 (G), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 *et seq.* The Department requests that you or other representative of IMS Environmental Services, Inc. ("IMS") attend a meeting in DEQ's office at **10:00 AM on Tuesday, January 29, 2008** to discuss this Warning Letter, as well as the Notice of Violation issued February 1, 2007, and subsequent corrective action.

OBSERVATIONS AND LEGAL REQUIREMENTS

On November 19, 2007, DEQ Tidewater Regional Office staff conducted a compliance evaluation inspection of hazardous waste transporter management and handling procedures at IMS. It is noted that IMS maintains a current hazardous waste transporters' permit in Virginia and is also listed as a used oil transporter. A copy of the inspection survey and checklist is attached for your information. The following describes the staff's factual observations and identifies the applicable legal requirements:

Observation: A review of IMS' *Transporter Annual Report*, dated February 18, 2007, for reporting year 2006 (the most recent report submitted), includes the following manifested shipments of hazardous waste that indicate apparent storage for greater than ten days at the IMS Norfolk, Virginia facility:

Date of IMS Receipt of Shipment	Generator Identification Number	Secondary Transporter Identification Number	Date IMS Released to Secondary Transporter	Uniform Hazardous Waste Manifest Number	Number of Days Stored Based on Available Data
02/01/2006	VACESQG	NCD000138107 (sic)*	02/15/2006	04118	14
08/01/2006	VAD000016214 (sic)**	NCR000138107	08/16/2006	43841	15

*Transporter/facility identification number should read NCR000138107

**Generator identification number should read VAP000016214

Legal Requirements:¹

- 1) 40 CFR 263.12, as adopted, states that a transporter who stores manifested shipments of hazardous waste in containers meeting the requirements of 40 CFR 262.30 at a transfer facility for a period of 10 days or less is not subject to regulation under parts 270, 264, 265, and 268 of this chapter with respect to the storage of those wastes.
- 2) 9 VAC 20-60-500 of the Virginia Hazardous Waste Management Regulations ("VHWMR") states that a transporter who stores manifested shipments of hazardous waste in containers meeting the requirements of 40 CFR 262.30 at a transfer facility for a period of 10 days or less is not subject to regulations established for facility management and permitting under these regulations with respect to storage of those wastes.
- 3) 40 CFR 270.1(c)(2), as adopted, states that the following persons are among those who are not required to obtain a RCRA permit: (vi) Transporters storing manifested shipments of hazardous waste in containers meeting the requirements of 40 CFR 262.30 at a transfer facility for a period of 10 days or less.
- 4) §10.1 – 1426.A of the Waste Management Act states that no person shall transport, store, provide treatment for, or dispose of a hazardous waste without a permit from the Director.

ADDITIONAL NOTES AND AREAS OF CONCERN

The following are not current compliance issues, however, these are additional notes and areas of concern observed during the November 19, 2007 compliance evaluation inspection that should be addressed to ensure full and complete compliance with the VHWMR and to operate "beyond compliance", as well as general public health, safety and environmental concerns.

- i) Manifests on file were not always the Transporter 1 copy; some were facsimiles of the initial generator copy. As a result, DEQ was unable to ascertain whether IMS, as Transporter 1, had acquired the signature of the second transporter or designated facility who received the waste. (Examples were manifests with initial transport dates of March 27, 2007 (City of Chesapeake Garage), and March 30,

¹ The Virginia Hazardous Waste Management Regulations ("VHWMR") are set forth at 9 VAC 20-60-12 *et seq.* (the "Regulations"). The Regulations at 9 VAC 20-60-124, 260-266, -268, -270, -273 and -279 adopt by reference certain provisions of Title 40 of the Code of Federal Regulations ("CFR"). Citations made herein will be to the relevant section of the CFR which are incorporated by reference into the Regulations.

2007 (Urology of Virginia).) You noted that original carbon copies of manifests are maintained in a different IMS office in northern Virginia and facsimiles are provided for the local office. It was suggested during the site visit you ensure the correct and applicable Transporter 1 facsimile is provided and retained in future.

ii) A hazardous waste log is used by IMS staff to track the receipt and shipment of hazardous waste containers into and out of the on-site transfer facility. A review of the log for calendar year 2007 exhibited several receipt entries that did not have corresponding shipment date entries. Shipment was subsequently verified by manifest review, however, it is suggested that staff be reminded to complete the log accurately and in a timely manner to verify compliance.

ENFORCEMENT AUTHORITY

Va. Code § 10.1-1455 of the Waste Management Act provides for an injunction for any violation of the Waste Management Act, Waste Management Board regulations, an order, or permit condition, and provides for a civil penalty up to \$32,500 per day of each violation of the Waste Management Act, regulation, order, or permit condition. In addition, Va. Code § 10.1-1455 (G) authorizes the Waste Management Board to issue orders to any person to comply with the Waste Management Act and regulations, including the imposition of a civil penalty for violations of up to \$100,000. Also, Va. Code § 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the Waste Management Act and regulations, and to impose a civil penalty of not more than \$10,000. Va. Code §§ 10.1-1455 (D) and 10.1-1455 (I) provide for other additional penalties.

The Court has the inherent authority to enforce its injunction, and is authorized to award the Commonwealth its attorneys' fees and costs.

FUTURE ACTIONS

After reviewing this letter, you are asked to prepare a corrective action plan specific to the issues discussed in this letter. The plan should address how IMS will ensure compliance with the transporter provisions of the law and regulations. **This corrective action plan should be submitted to DEQ for review within 30 days of the date of this letter, or may be presented at the meeting on January 29, 2008.** If corrective action will take longer than 90 days to complete, you may be asked to enter into a Consent Order with the Department to formalize the plan and schedule. *It is DEQ policy that appropriate, timely, corrective action undertaken in response to a Warning Letter will avoid adversarial enforcement proceedings and the assessment of civil charges or penalties.*

Please advise us if you dispute any of the observations recited herein or if there is other information of which DEQ should be aware. In the event that discussions with staff do not lead to a satisfactory conclusion concerning the contents of this letter, you may elect to participate in DEQ's Process for Early Dispute Resolution. If you complete the Process for Early Dispute Resolution and are not satisfied with the resolution, you may request in writing that DEQ take all necessary steps to issue a case decision where appropriate. For further information on the Process for Early Dispute Resolution, please visit the Department's website under "Laws & Regulations" and "DEQ regulations" at: http://www.deq.virginia.gov/regulations/pdf/Process_for_Early_Dispute_Resolution_8260532.pdf or ask the DEQ contact listed below.

Warning Letter
IMS Environmental Services, Inc.
January 11, 2008
Page 4 of 4

I am your contact at DEQ in this matter and may be reached directly at (757) 518-2175 or lasilvia@deq.virginia.gov. I look forward to meeting with you at 10:00 AM on January 29, 2008 at the DEQ office, 5636 Southern Boulevard, Virginia Beach.

Sincerely,



Lisa A. Silvia

Waste Inspector Senior II

Enclosures

Hazardous Waste Survey Sheet
Checklist for RCRA Inspection of Transporters

cc: Robin Schuhmann, Enforcement Specialist, DEQ, TRO
Julia King-Collins, DEQ, OWTS (*w/o enclosures*)
Kimberlyn Hughes, DEQ, OWTS (*electronic database form only*)
File -- NHW



Hazardous Waste Survey Sheet

Facility Name	IMS Environmental Services Inc.	EPA ID Number	VAD041447111(5)		
Physical Address	1301 Marsh Street	City	Norfolk	State	VA Zip 23523
Mailing Address	PO Box 1779	City	Norfolk	State	VA Zip 23501
Facility Representative(s)		Contact Information			
		Tel.	(757) 543-5718		
		Fax.	(757) 543-4561		
		E-mail	rmay@hepaco.com		
DEQ Representative(s)		Date	Type of Inspection		
Lisa A. Silvia, Waste Inspector Senior II, Robin J. Schuhmann, Enforcement Specialist		November 19, 2007	CEI-Transporter		

1 BUSINESS DESCRIPTION

What is the business activity of the firm? (i.e., furniture manufacturing, metal plating, recycling)

Emergency response contract services, remediation services, hazardous, used oil, medical and solid waste transport, and tank cleaning.

SIC Code(s)	(See NAICS)	NAICS Code(s)	562910 – Remediation Services
-------------	-------------	---------------	-------------------------------

Provide a description of processes and/or processes generating wastes. Attach a flow diagram for on-site waste management processes (other than simple satellite/container accumulation, unless relevant).

No routine hazardous waste generation on site. Use aqueous parts washer solution serviced through Safety-Kleen for on-site maintenance-related activities.

Transport of hazardous waste in containers as transporter #1; 10-day transfer facility on site consists of a locked trailer box.

Used oil transporter.

Oil/water (petroleum) separation/processing services (in tanks) on site connected to a CWA-permitted pre-treatment process, including sludge management. Waters are discharged to HRSD. Sludge is analyzed for TCLP prior to disposal to a permitted solid waste management facility, including SPSA, Soilex, or the Middle Peninsula Landfill. Oils which are not processed on site are sent directly to C&M Industries, Norfolk, for recycle.



Hazardous Waste Survey Sheet

2 WASTESTREAM(S)

Give a brief description of the waste stream(s) (by chemical name, if possible) and hazardous waste code(s) generated by the facility.

No routine hazardous waste generation on site.

3 GENERATION RATE(S)

(a) List the (a) nominal amounts of hazardous waste generated in any month and (b) the greatest amounts of all wastes ever accumulated/generated at the site if applicable to generator category determination (i.e., if a CESQG, have they ever exceeded 1000 kg accumulation, or if a SQG have they ever exceeded 1000 kg/mo generation for all waste streams aggregate).

Waste codes	(a) Amount generated in any month	(b) Greatest amounts of ever accumulated
N/A		

4 ACUTE HAZARDOUS WASTE

Yes No NA

(a) Has the facility generated >1 kg/mo of *acute* hazardous waste (P-list)?

☐ ☒ ☐

(b) Has the facility generated >100 kg of *acute* hazardous waste from spill clean-up residue?

☐ ☒ ☐

5 EXCLUSIONS

Yes No NA

(a) Does the facility generate any hazardous waste that is excluded from regulation? (i.e., reclaimed on-site, used as a substitute for a CCP, de-characterized by treatment). If yes, list the waste and the basis for the exclusion.

☒ ☐ ☐

COMMENTS:

Recovered gasoline from gassy waters is sold as fuel. Recovered oil from oily waters/vessel slops is blended and sold as #5 fuel.

6 PRECIOUS METALS RECYCLING

Yes No NA

(a) Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

☐ ☒ ☐

(b) If yes, list the waste and where it is sent. Verify compliance with Part 266 Subpart F and provide comments:



Hazardous Waste Survey Sheet

7 ACCUMULATION TIME AND QUANTITY

(c) Has the facility accumulated hazardous waste in excess of time and quantity limits established for their generator class? [NOTE: A CESQG may not accumulate more than 1000 kg, a SQG may not accumulate more than 6000 kg or accumulate more than 180 days (or 270 days), and a LQG may not accumulate more than 90 days.]

Yes No NA NC
☐ ☐ ☒ ☐

(d) Has the facility *episodically* generated hazardous waste in excess of their normal generator category? [Note: Applicable generator category requirements apply to *ALL* wastes during the period of generation and for as long as the waste remains on-site.]

☐ ☒ ☐ ☐

8 OFF-SITE SHIPMENT

How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed.)

Transporters/TSD Fac.	EPA ID Numbers	On-site Treatment
(Based on review of CY2007 manifests)		
<u>Transporters (IMS is primary; others are secondary to TSD):</u>		
Freehold Cartage	NJD054126164	
IMS Environmental Services Inc	VAD041447111	
Parts Cleaning Tech	NCR000138107	
Safety-Kleen (for IMS parts washer)	TXR000050930	
<u>Disposal Facilities (for waste transported by IMS):</u>		
Cycle Chem Inc, Lewisberry, PA	PAD067098822	
Parts Cleaning Technologies PCT, Charlotte, NC	NCR000138107	
Republic Environmental System (PA) Inc., Hatfield, PA	PAD085690582	
Safety-Kleen, Chesapeake, VA (for IMS P/W)	VAD000737346	

9 FACILITY UNIVERSE

Based on the above preliminary information, the facility is considered to have acted as and is being evaluated for this inspection as a:

- ☐ Conditionally exempt small quantity generator (CESQG)
- ☐ Small quantity generator (SQG)
- ☐ Large quantity generator (LQG)
- ☐ Permitted or interim status TSDF
- ☒ Transporter – hazardous waste and used oil
- ☐ Other: explain

NOTE: If episodic generation has occurred, assign an appropriate generator status for this evaluation and assess compliance during/for the episodic period.

Comments:



Hazardous Waste Survey Sheet

10 VIRGINIA SPECIFIC REQUIREMENTS FOR NOTIFICATION

Yes No NA NC

(a) Is the facility subject to the annual fee as a permitted facility or generator? (9 VAC 20-60-1283)

☐ ☒ ☐ ☐

(b) For new, episodic or provisional generators, has the facility provided notification to DEQ that it is a generator by submitting documentation to the Regional Office as required under 9 VAC 20-60-315 and 20-60-1283?

☐ ☐ ☒ ☐

11 GENERAL COMMENTS

Annual inspection for facility designated a significant non-complier on 2/1/07; only transporter checklist completed for this compliance review.

See cover letter for additional details and concerns.

DEPARTMENT OF ENVIRONMENTAL QUALITY

CHECKLIST FOR RCRA INSPECTION OF TRANSPORTERS

FACILITY NAME: IMS Environmental Services Inc.

EPA ID NUMBER: VAD041447111(5)

INSPECTION DATE: November 19, 2007

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

VHWMR Section 9 VAC 20-60-

PART/ SECTION	REGULATION	YES	NO	P/V
420.A	Does the company transport hazardous waste which:			
	Originates within the Commonwealth?	X		
420.D.1	Originates within <u>another state</u> or a foreign county? (If yes, for foreign country, complete large quantity generator (LQG) checklist)	X		
	Terminates within the Commonwealth.		X	
	If yes to a, b or c above, complete the remainder of this checklist			
420.D.2	Does the transporter mix hazardous wastes of different shipping descriptions by placing them into a single container or tank? (If yes, complete large quantity generator checklist). (This does not apply to CESQG waste)		X	
420.E 420.F 420.G.	Does the transporter have a currently valid Virginia Hazardous Waste Transporter permit? Permit Number: VAD0414471115 Permit Expiration date: 11/09/2011 (The term of the permit shall be ten years)	X		

PART/ SECTION	REGULATION	YES	NO	P/V
430.A	Does the transporter retain one signed copy of all manifests for at least three years from the date of acceptance?	X		
460 & 40 CFR 262.B.5.	Are all hazardous waste transport vehicles placarded in accordance with the applicable provision of the Regulations Governing the Transportation of Hazardous Materials? Not evaluated, no waste in transit			
480.D	Does the transporter ensure that all labeling and packaging requirements required in Part VI of the VHWMR have been met by the generator before accepting a shipment of hazardous waste? Not evaluated			
470	Is the transporter currently employing a manifest system for all hazardous waste accepted from generators? (Does not apply to wastes received from conditionally exempt small quantity generators and wastes subject to reclamation agreement in accordance with 5.C.)	X		
470	Is the following information included on the transporter's copy of <u>each</u> manifest: See 'Area of Concern' in cover letter to this report regarding manifests.			
	a. The generator's name, address, telephone number and EPA ID number?	X		
	b. Generator's signature and date of release?	X		
	c. A unique manifest number assigned?	X		
	d. Transporter(s) name and EPA ID number?	X		
	e. Printed transporter name, signature, and date of acceptance?	X		
	f. Name, site address, and EPA ID number of the facility designated to receive the waste?	X		
	g. Printed TSD representative's name, signature and date of acceptance? *See cover letter	*		
	h. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing The Transportation of Hazardous Materials?	X		
	i. Quantities of each waste shipped and the units of weight or volume and the type and number of containers as loaded into or onto the transporter's vehicle?	X		

PART/ SECTION	REGULATION	YES	NO	P/V
470	<p>j. The following certification from the generator:</p> <p>"I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations.</p> <p>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford".</p>	X		
480.C	Has the transporter signed and dated each manifest acknowledging acceptance from the generator before transporting the waste?	X		
470	Does the transporter transport hazardous waste from generators of greater than 100 kg but less than 1,000 kg of hazardous waste in a calendar month pursuant to a reclamation agreement? If yes,		X	
	a. Is the following information contained on a log or shipping paper for each shipment:	N/A		
	- the name, address and EPA Identification number of the generator of the waste?			
	- the quantity of waste accepted?			
	- all DOT required shipping information?			
	b. Does the transporter carry this record when transporting the waste to the reclamation facility?	N/A		
	- the date the waste is accepted?			
	c. Does the transporter retain these records for at least three years?	N/A		

PART/ SECTION	REGULATION	YES	NO	P/V
480.H & 480.I	Has the transporter delivered shipments of hazardous waste only to storage, treatment, disposal, or other facilities permitted by the state in which the facility is located or to facilities permitted by the EPA or which qualify for interim status?	X		
490.C	Has the transporter had a hazardous waste spill which involved any of the following:			
	a. A person being killed;		X	
	b. A person receiving injuries requiring hospitalization;		X	
	c. Estimated carrier or other property damage exceeding \$50,000;		X	
	d. Fire, breakage, spillage or suspected radioactive contamination resulting in a spill of radioactive material;		X	
	d. A situation which is deemed by the transporter to otherwise cause danger to life?		X	
	If yes to any of the above:			
490.C.1 & 490.C.2	- Did the transporter give notice at the earliest practicable moment to the national response center, U.S. Coast Guard and the Department of Emergency Services? (In case of a spill affecting State waters, notice shall also be given to the DEQ Water Division PREP team.)	N/A		
490.C.4	- Was a written report filed with the Department within 15 calendar days of the spill?	N/A		
490.E	Has the transporter had a hazardous waste spill from a fixed facility (e.g. transfer facility) which required notification to the National Response Center? If yes, did the transporter notify the Chief Administrative Officer of the local government of the jurisdiction in which the release occurred?		X	
500	Has the transporter stored hazardous waste in containers or tanks for greater than ten days at the transfer facility?	*		*
279	Does the transporter act as a marketer of used oil burned for energy recovery? (If yes, complete the used oil burned for energy recovery checklist)		X	

Comments: See cover letter to this report regarding details of item labeled "Part/Section 500" above.

**NOTE: A MARK IN THE "P/V" COLUMN INDICATES A POTENTIAL VIOLATION
IF A QUESTION IS NOT APPLICABLE, INDICATE "N/A" ACROSS THE COLUMNS**

Violations Continued

Violation	Viol Seq	Link	Violation Type	Region	Person	Date	Regulation Citation	RTC Dates		Qual.	Comments
Add		Y						Scheduled	Actual		
Add		Y									
Add		Y									
Add		Y									
Add		Y									
Add		Y									

ENFORCEMENT ACTIONS		Indicate Add, Change, Delete:	Add	Date	1/11/2008	Person:	R6LAS
		Type of Action:	119 - VA Warning Letter	Multi-Media Enforcement Codes:			

Penalty Type	Penalty Amount	Comments:
1.		See also 120 and 122 of 2/1/07, SNY of 2/1/07
2.		
3.		
4.		
5.		

Outstanding Violations Covered by the Above Enforcement Action

Viol Seq	Viol. Type	Person	Date Determined	Viol Seq	Viol Type	Person	Date Determined	Viol Seq	Viol Type	Person	Date Determined
	263.A	R6LAS	11/19/07	0	0	0	01/00/00	0	0	0	01/00/00
	XXS	R6LAS	11/19/07	0	0	0	01/00/00	0	0	0	01/00/00
	270.A	R6LAS	11/19/07	0	0	0	01/00/00	0	0	0	01/00/00
	FSS	R6LAS	11/19/07	0	0	0	01/00/00	0	0	0	01/00/00
11	263.A	R6LAS	12/19/06	0	0	0	01/00/00	0	0	0	01/00/00
12	XXS	R6LAS	12/19/06	0	0	0	01/00/00	0	0	0	01/00/00
13	270.A	R6LAS	12/19/06	0	0	0	01/00/00	0	0	0	01/00/00
14	FSS	R6LAS	12/19/06	0	0	0	01/00/00	0	0	0	01/00/00
				0	0	0	01/00/00	0	0	0	01/00/00
				0	0	0	01/00/00	0	0	0	01/00/00
				0	0	0	01/00/00	0	0	0	01/00/00
				0	0	0	01/00/00	0	0	0	01/00/00



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

5636 Southern Boulevard, Virginia Beach, Virginia 23462

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L. Preston Bryant, Jr.
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Francis L. Daniel
Regional Director

March 7, 2008

Mr. Robert W. May, PG
Mid-Atlantic Region Manager
IMS Environmental Services Inc.
PO Box 1779
Norfolk, Virginia 23501-1779

RE: EPA ID #VAD041447111(5)
IMS Environmental Services Inc. ("IMS")
1301 Marsh Street
Norfolk

Dear Mr. May:

The Department of Environmental Quality ("DEQ") Tidewater Regional Office ("TRO") issued a Warning Letter dated January 11, 2008 to the referenced facility for apparent noncompliance with the requirements of a permitted hazardous waste transporter's operation of a transfer facility. In response to the issues identified in the Warning Letter, DEQ and IMS staff met on January 29, 2008 to discuss corrective actions planned or implemented by IMS. In addition, DEQ received your written response on January 29, 2008, as well as additional information provided with the submittal of the 2007 hazardous waste transporter annual report on February 19, 2008. During the meeting and in the written correspondence, IMS identified a series of operational and management actions implemented to prevent future occurrence of the issues cited in the Observations and Legal Requirements section of the Warning Letter. These responses satisfy DEQ's request for a plan of corrective action. No additional information is requested in response to the January 11, 2008 Warning Letter.

It is noted, however, that this correspondence only addresses the observations of the January 2008 Warning Letter and does not resolve the issues cited in the Notice of Violation issued February 1, 2007. The Notice of Violation will be handled separately by the Enforcement Specialist, Mr. Robin Schuhmann.

Mr. Robert W. May, PG
IMS Environmental Services Inc.
March 7, 2008
Page 2 of 2

Not directly related to the Warning Letter or Notice of Violation, it has also been noted that IMS might have need to utilize the Marsh Street location's EPA identification number as a generator of hazardous waste for wastes generated in equipment and shop operations at the Marsh Street location. This observation is based on the review of a manifest dated January 21, 2008 for less than 220 pounds of waste paint-related material transported off site. IMS is currently identified in the RCRAInfo database for its hazardous waste and used oil transportation operations only. It is suggested that IMS submit a subsequent notification on EPA Form 8700-12, RCRA Subtitle C Site Identification Form to identify the applicable generator activity.

If you have any questions about the content of this letter, please contact me at (757) 518-2175 or lasilvia@deq.virginia.gov

Sincerely,



Lisa A. Silvia
Waste Inspector Senior II

c: Robin Schuhmann, DEQ-TRO
File - NHW
Kimberlyn Hughes, DEQ, OWTS (*electronic database form only*)

